

# **EXPORT-RELATED RESTRICTIONS FOR DUAL-USE GOODS AND ADVANCED TECHNOLOGIES**

**RELATED PROVISIONS: ARTICLES 2, 2a, 2b and 2d OF COUNCIL REGULATION 833/2014**  
**FREQUENTLY ASKED QUESTIONS – AS OF 16 OCTOBER 2025**

## **1. What is the purpose of this Guidance?**

*Last update: 16 October 2025*

Council Regulation (EU) 2022/328 of 25 February 2022<sup>1</sup>, Council Regulation (EU) 2022/345 of 1 March 2022<sup>2</sup>, Council Regulation (EU) 2022/394 of 9 March 2022<sup>3</sup>, Council Regulation (EU) 2022/428 of 15 March 2022<sup>4</sup>, Council Regulation (EU) 2022/576 of 8 April 2022<sup>5</sup>, Council Regulation (EU) 2022/879 of 3 June 2022<sup>6</sup>, Council Regulation (EU) 2022/1269 of 21 July 2022<sup>7</sup>, Council Regulation (EU) 2022/1904 of 6 October 2022<sup>8</sup>, Council Regulation (EU) 2022/2474 of 16 December 2022<sup>9</sup>, Council Regulation (EU) 2023/427 of 25 February 2023<sup>10</sup>, Council Regulation (EU) 2023/1214 of 23 June 2023<sup>11</sup>,

Council Regulation (EU) 2023/2878 of 18 December 2023<sup>12</sup>, Council Regulation (EU) 2024/745

---

<sup>1</sup> Council 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.

<sup>2</sup> Council Regulation (EU) 2022/334 of 28 February 2022 amending Council Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>3</sup> Council Regulation (EU) 2022/394 of 9 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>4</sup> Council Regulation (EU) 2022/428 of 15 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>5</sup> Council Regulation (EU) 2022/576 of 8 April 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>6</sup> Council Regulation (EU) 2022/879 of 3 June 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>7</sup> Council Regulation (EU) 2022/1269 of 21 July 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>8</sup> Council Regulation (EU) 2022/1904 of 6 October 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>9</sup> Council Regulation (EU) 2022/2474 of 16 December 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>10</sup> Council Regulation (EU) 2023/427 of 25 February 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>11</sup> Council Regulation (EU) 2023/1214 of 23 June 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>12</sup> Council Regulation (EU) 2023/2878 of 18 December 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

of 23 February 2024<sup>13</sup>, Council Regulation (EU) 2024/1745 of 24 June 2024<sup>14</sup>, Council Regulation (EU) 2024/3192 of 16 December 2024<sup>15</sup>, and Council Regulation (EU) 2025/395 of 24 February 2025<sup>16</sup> build on, and expand, the EU restrictive measures (sanctions) in form of export restrictions under the Sanctions Regulation<sup>17</sup>.

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

## **2. What does the Sanctions Regulation do in the area of export restrictions for dual-use items and advanced technologies?**

*Last update: 16 October 2025*

Firstly, the Sanctions Regulation has expanded the scope of export restrictions concerning dual-use goods and technologies as identified in Annex I to the EU Dual-Use Regulation<sup>18</sup>. The export of these items has been prohibited since 2014 for the military sector. The prohibition also applies even when these items are intended for civilian end-users or uses, with very limited exemptions and derogations.

Secondly, the Sanctions Regulation also prohibits the export of additional ‘Advanced Technology’ items, which could also have dual-use applications, to limit the enhancement of Russia’s military and technological capacity in sectors such as electronics, computers, telecommunications and information security, sensors and marine lasers, chemicals that could be used in the process of manufacturing chemical weapons, special materials and related equipment, manufacturing equipment and other sensitive items, such as those used by law enforcement bodies.

Thirdly, the Sanctions Regulation now prohibits to sell, supply, transfer or export, directly or indirectly, dual-use goods and technology and advanced technology, whether or not originating in

---

<sup>13</sup> Council Regulation (EU) 2024/745 of 23 February 2024 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine

<sup>14</sup> Council Regulation (EU) 2024/1745 of 24 June 2024 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine

<sup>15</sup> Council Regulation (EU) 2024/3192 of 16 December 2024 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine

<sup>16</sup> Council Regulation (EU) 2025/395 of 24 February 2025 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine

<sup>17</sup> Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine.

<sup>18</sup> 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.

the Union, to any natural or legal person, entity or body listed in Annex IV.

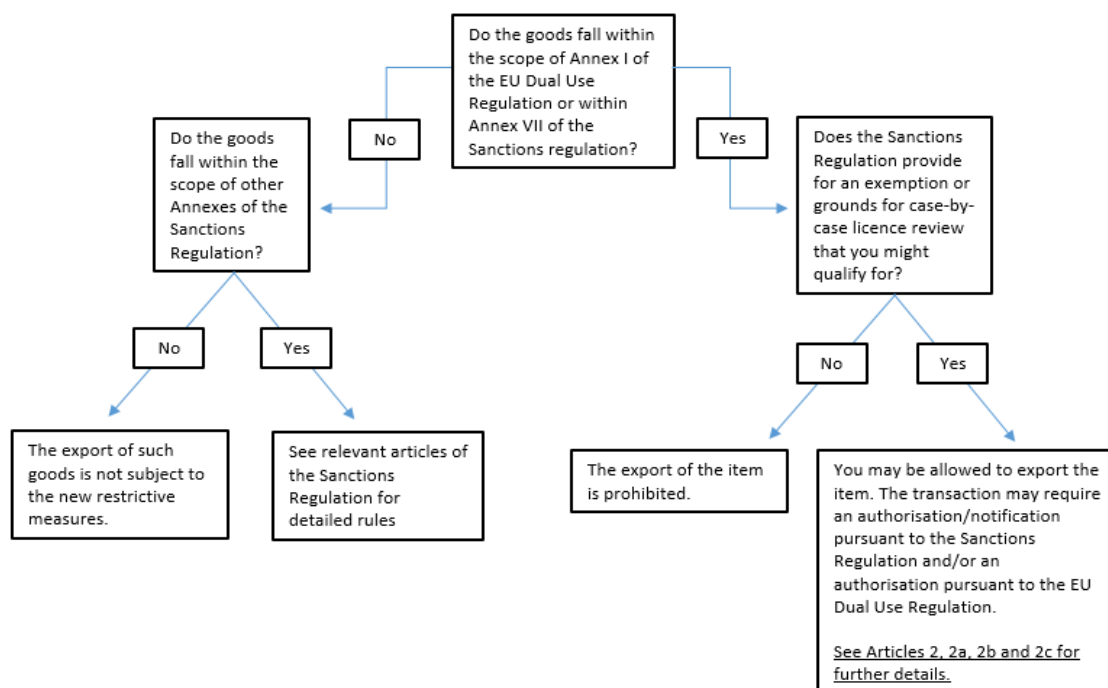
As in other EU sanctions regimes, the export restrictions apply to the sale, supply, transfer and export of covered items, as well as the provision of brokering services and of technical and financial assistance.

Lastly, the new provisions foresee very limited exemptions and derogations in certain defined situations, as explained in this document below.

### **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?**

*Last update: 16 October 2025*

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, XI, XVIII and XXIII, only include codes of the Combined Nomenclature (CN). Dual-use items and most of the advanced technology items listed in Annex VII are identified with technical descriptions, except for the latter's Part B which contains CN codes. 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 to 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 measures take the form of “prohibitions”: is there now a total ban of exports to Russia for dual-use and ‘Advanced Technology’ items?**

*Last update: 16 October 2025*

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 according to Article 2(3) and Article 2a(3) cover humanitarian needs, health emergencies, natural disasters, medical and pharmaceutical uses, provided that they are not listed in Annex XL to this Regulation. Derogations according to Article 2(4) and Article 2a(4) cover, among others, exports intended for government-to-government cooperation in space programmes, exports intended for civilian non-publicly available electronic communications networks which are not the property of an entity that is publicly controlled or with over 50% public ownership, 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, exports covered by prior contracts, items ensuring cyber-security and information security, software updates, use as consumer communication devices, or medical or pharmaceutical purposes, provided that they are listed in Annex XL to this Regulation.

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 Article 2b(1)(a) and (b).

In parallel, it should be noted that the above-mentioned exemptions and derogations are unavailable either for exports for the energy sector and for aviation or space industry, except if they are intended for intergovernmental cooperation in space programmes.

**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?**

*Last update: 16 March 2022*

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, trade may not proceed until such an authorisation is granted.

**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?**

*Last update: 16 March 2022*

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 Sanctions Regulation relate to the existing Dual-Use Regulation? Does it supersede it? Do both continue to apply?**

*Last update: 16 October 2025*

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 EU 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 according to Articles 2(3) and 2a(3), no prior authorisation is required under the Sanctions Regulation provided that the use of the exemption is declared to the customs authorities and a notification is made of the first use per recipient in Russia. For dual-use items, however, an authorisation might still be required under the EU Dual-Use Regulation.

For authorisations for goods and technology listed in Annex VII to 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 to the Dual-Use Regulation is subject to an authorisation requirement under the EU Dual-Use Regulation, for example under Article 4 (so-called ‘catch-all’ clause), 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 to the Sanctions Regulation?**

*Last update: 16 October 2025*

The export of dual-use items listed in Annex I to the EU Dual-Use Regulation and “advanced technologies” listed in Annex VII to the Sanctions Regulation to entities listed in Annex IV to the Sanctions Regulation is prohibited under the Sanctions Regulation. The export of dual-use items, not listed in Annex I to the EU Dual-Use Regulation or Annex VII to the Sanctions Regulation, to other entities, not listed in Annex IV of the Sanctions Regulation, may still be subject to control under the “catch-all clause” of the EU Dual-Use Regulation, i.e. to ensure that they are not for military uses or end-users.

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

*Last update: 25 March 2025*

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), 2a(3), 2(4), 2a(4) , 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?**

*Last update: 16 October 2025*

The notification to the competent authority and the request for authorisation shall – whenever possible - be submitted by electronic means. Annex IX to the Sanctions Regulation provides forms containing the mandatory elements for these notifications or applications and exporters should use these forms, whenever possible. 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) to the competent authority pursuant to that Regulation.

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 to the EU Dual-Use Regulation or in Annex VII to the Sanctions Regulation. Am I concerned by the export restrictions?**

*Last update: 10 October 2022*

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 controls or the restrictions on dual-use and ‘Advanced technology’ items pursuant to the Sanctions Regulation.

However, non-controlled items containing one or more components listed in Annex I to the EU Dual-Use Regulation may still be subject to export controls under the so-called ‘principal elements rule’ (point 2 of the General Notes to Annex I to the EU Dual-Use Regulation). This means that the object of the controls contained in Annex I may not be defeated by the export of any non-controlled goods containing one or more controlled components when the controlled component or components are the principal element of the goods and can feasibly be removed or used for other purposes. In judging whether the controlled component or components are to be considered the principal element, it is necessary to weigh the factors of quantity, value and technological know-how involved and other special circumstances which might establish the controlled component or components as the principal element of the goods being procured.

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

*Last update: 16 October 2025*

Articles 2(3) and 2a(3) of the Sanctions Regulation provide for two 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 of the first use per recipient in Russia. These exemptions apply to:

- 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; or
- medical or pharmaceutical purposes, provided they are not listed in Annex XL to this Regulation.

For exemptions related to transit through Russia, please check question 42.

## **13. What situations are covered by the derogations with requirement of authorisation under the Sanctions Regulation?**

*Last update: 16 October 2025*

Article 2(4) of the Sanctions Regulation provides for 10 derogations where an authorisation must be requested from the competent authority. The export of the item is prohibited until the authorisation is granted. The derogations cover situations where the item is intended for:

- intergovernmental cooperation in space programmes;

- 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;
- maritime safety;
- civilian non-publicly available electronic communications networks which are not the property of an entity that is publicly controlled or with over 50% public ownership;
- 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;
- diplomatic representations of the Union, Member States and partner countries, including delegations, embassies and missions;
- 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;
- software updates;
- use as consumer communication devices; or
- medical or pharmaceutical purposes, provided that they are listed in Annex XL to this Regulation.

Article 2a(4) of the Sanctions Regulation provides for 11 derogations where an authorisation must be requested from the competent authority. Until the authorisation is granted, the export of the item is prohibited. The derogations cover situations where the item is intended for:

- intergovernmental cooperation in space programmes;
- 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;
- maritime safety;
- civilian non-publicly available electronic communications networks which are not the property of an entity that is publicly controlled or with over 50% public ownership;
- 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;
- diplomatic representations of the Union, Member States and partner countries, including delegations, embassies and missions;
- 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;

- exclusive use and under the full control of the authorising Member State and in order to fulfil its maintenance obligations in areas which are under a long-term lease agreement between that Member State and the Russian Federation;
- software updates;
- use as consumer communication devices; or
- medical or pharmaceutical purposes, provided that they are listed in Annex XL to this Regulation.

Article 12b of the Sanctions Regulation provides for a temporary derogation strictly necessary for the divestment from Russia or the wind-down of business activities in Russia subject to the fulfilment of certain conditions. Request for authorisations under this derogation can take place until 31 December 2023.

For contracts concluded before 26 February 2022, please check questions 29 to 32. For situations with individuals or entities listed in Annex IV, please check question 20. For derogations related to transit through Russia, please check question 43.

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

*Last update: 16 March 2022*

It is for the 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, and declarations from the exporter (self-declaration).

**15. The exemption under Article 2(3)(b) and Article 2a(3)(b) can apply under the condition that the goods and technology are intended for non-military use and for a non-military end-user. What does that mean?**

*Last update: 16 October 2025*

The exemptions in Articles 2(3) and 2a(3) allow exports of dual-use and advanced technologies intended for humanitarian purposes, health emergencies and medical purposes, provided the latter are not listed in Annex XL to this Regulation, from the relevant restrictions, as long as such exports are destined for non-military use and for a non-military end-user. Therefore, where the items are destined for a civilian facility as the end-user, the exemption could apply unless there are reasonable grounds to believe that the items could be diverted to a military use or end-user.

**16. Can you explain in more detail how exemptions and derogations operate concerning the exports of Dual-use items and ‘Advanced Technology’ items?**

*Last update: 16 October 2025*

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 to 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 end-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 to each recipient in Russia using the relevant exemption. 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 10 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 29-32.
- For ‘Advanced Technology’ items as listed in Annex VII to the Sanctions Regulation:
  - if the intended end-use falls under the scope of the two 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 of the first use per recipient in Russia using the relevant exemption.

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 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 29-32.

In addition, as regards aviation and space industry items, please see question 4, which confirms that the derogations and exemptions above are not available for those sectors except if they are intended for intergovernmental cooperation in space programmes.

### **17. What rules and procedures apply to the authorisations pursuant to the Sanctions Regulation?**

*Last update: 16 March 2022*

Authorisations pursuant to Articles 2, 2a and 2b are processed by the 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.

### **18. I am an exporter of cyber-security and information security items, such as software, do I need to apply for a licence under the Sanctions Regulation each time I make a software available to my Russian customers and provide updates to them?**

*Last update: 10 October 2022*

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 EU 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.

For authorisations for goods and technology listed in Annex VII to the Sanctions Regulation, the rules and procedures laid down in the EU Dual-Use Regulation apply, mutatis mutandis. This means, for example, that the competent authority of the Member State where the exporter is resident or established may decide to grant a global export authorisation, as defined in the EU Dual-Use Regulation<sup>7</sup>, for the export of cyber-security and information security items in Annex VII. Such authorisation could cover, for instance, the export of a specified item and subsequent

*updates* (for example bug-fixes, malware fingerprint data) and/or *upgrades* (unlocking additional functionalities) to multiple end-users in Russia, recognising that some exporters of cybersecurity items may have large numbers of customers.

**19. Can my company perform remote software configuration updates, software monitoring and software log analysis telecommunication and Information Security equipment installed in Russian sites of customers?**

*Last update: 16 October 2025*

Sale, supply, transfer or exports of dual-use and advanced technology items (as well as related provision of technical assistance) intended for software updates are allowed under the exemption of Articles 2(3)(d) and 2a(3)(d) of the Sanctions Regulation. EU companies can provide remote software interventions, including software configuration updates, software monitoring and software log analysis, related to dual-use goods and technology and to certain goods and technology listed in annex VII to the Sanctions Regulation for non-military use and for a non-military end-user. As indicated in the relevant provisions, the exporter shall notify the competent authority of the Member State where the exporter is resident or established of the first use per recipient in Russia of the relevant exemption.

**20. 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?**

*Last update: 10 October 2022*

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 authorisation by the 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 competent authority, but trade must stop until such authorisation is granted. Such authorisations should have been 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 the Sanctions Regulation, 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.

**21. 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?**

*Last update: 16 March 2022*

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 29-32.

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

*Last update: 16 March 2022*

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.

**23. How should the term ‘other services’ be interpreted?**

*Last update: 9 June 2022*

The term “other services” is comprehensive. It covers all services that are "related to the goods and technology [...] 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”. It is for the EU Company to ensure that the provision of services in question is not related to the sanctioned good or to the provision, manufacture, maintenance and use of this sanctioned good.

**PRACTICAL OPERATION OF THE EXPORT RESTRICTION OF DUAL-USE AND ‘ADVANCED TECHNOLOGY’ ITEMS FOR BUSINESSES**

**24. 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?**

*Last update: 16 March 2022*

Items in Annex VII are listed on the basis of their description and their technical parameters, whereas this Annex' part B includes CN codes. 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.

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

*Last update: 10 October 2022*

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

Annex I 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 2658/87<sup>19</sup> and as set out in Annex I thereto, which are valid at the time of publication of the Sanctions Regulation.

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

*Last update: 16 March 2022*

The term ‘tractor’ (Item X.A.VII.001.b in Annex VII) concerns off-highway wheel tractors, which

---

<sup>19</sup> Council Regulation (EEC) No 2658/87 of 23 July 1987 on the tariff and statistical nomenclature and on the Common Customs Tariff.

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.

## **27. How do I apply for a derogation concerning dual-use items?**

*Last update: 16 March 2022*

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 to 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 Union<sup>20</sup>. A [copy of that list](#) is available on the dedicated website of the Commission.

## **28. I have a contract with a Russian company involving the exports of an item covered by the Sanctions Regulation. Can I continue exporting the item to the Russian company?**

*Last update: 10 October 2022*

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 end-users provided the exporter requested such an authorisation before 1 May 2022. These authorisations shall be assessed by the competent authority 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.

---

<sup>20</sup> [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.

The competent authority of the Member State where the exporter is resident or established 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 or that the goods might have a military use, unless the export is intended for 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. Furthermore, national competent authorities shall not grant an authorisation if there are reasonable grounds to believe that the export is intended for aviation or the space industry (unless it is intended for intergovernmental cooperation in space programmes) or for the energy sector.

If the contract has been concluded directly with an individual or entity listed in Annex IV, national competent authorities can authorise its continued execution only if the items are necessary 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.

All authorisations by the competent authorities of the Member States must be granted in accordance with the rules and procedures laid down in the EU Dual-Use Regulation, which applies *mutatis mutandis*. This includes the period of validity of such authorisations.

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.

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

*Last update: 16 March 2022*

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 Union<sup>21</sup>. A [copy of that list](#) is available on the [Dual-use export control webpage](#) of the Commission.

---

<sup>21</sup> [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.



**30. 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?**

*Last update: 16 October 2025*

No. The derogations in Articles 2(5) and 2a(5) are intended for non-military uses and for non-military end-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(1b) 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.

In all cases, an authorisation for the execution of a contract concluded before 26 February 2022 can only be granted if the request for authorisation was made before 1 May 2022.

**31. 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?**

*Last update: 16 March 2022*

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 of those parts of the contract concerning after-sale services.

**32. 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?**

*Last update: 16 March 2022*

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 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.

**33. 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?**

*Last update: 16 March 2022*

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 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.

**34. 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?**

*Last update: 16 March 2022*

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.

**35. 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?**

*Last update: 16 March 2022*

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 29-32.

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

*Last update: 16 March 2022*

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 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 competent authority to annul, suspend, modify or revoke export authorisations.

The Sanctions Regulation allows the 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.

### **37. Do export licences issued before 26 February 2022 remain valid?**

*Last update: 16 March 2022*

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

That being said, the Sanctions Regulation does not oblige the competent authorities to suspend or revoke licences granted under the EU 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.

### **38. What about goods that are *en route*? Do you have a “shipping” clause?**

*Last update: 10 October 2022*

No. The Sanctions Regulation does not provide specific flexibilities for items that were under way inside the European Union on the date when the item concerned became subject to Articles 2, 2a or 2b of the Regulation.

### **39. I have been trading under conditions and requirements for using a General Export Authorisation No EU003 (Export after repair/replacement), EU004 (Temporary export for exhibition or fair) or EU005 (Telecommunications). Can I export to Russia?**

*Last update: 10 October 2022*

Pursuant to Article 12(1)(d) of the EU Dual-Use Regulation, Union general export authorisations apply to exports of certain items to certain destinations under specific conditions and requirements for use.

The three following Union general export authorisations were – in the past - usable for exports to Russia of dual-use items, under specific conditions and requirements for each of them:

- EU003: Union general export authorisations for items that are re-exported after being repaired or replaced in the Union.
- EU004: Union general export authorisations for items that are temporarily exported for the purpose of an exhibition or fair.
- EU005: Union general export authorisations for items of the telecommunications category.

In order to align the EU Dual-Use Regulation with the restrictive measures against Russia and to ensure legal clarity, Russia was removed from the list of destinations covered by those Union general export authorisations, by means of a delegated regulation amending the relevant Annexes to the EU Dual-Use Regulation<sup>22</sup>. The delegated regulation entered into force on 5 May 2022.

**40. 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?**

*Last update: 16 March 2022*

Goods located in the EU having Russia as a final destination, and which are included in the sanctions list, fall under the scope of Articles 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 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).

**41. 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?**

*Last update: 16 March 2022*

The controls in the Sanctions Regulation apply also to the "sale, supply or transfer" of dual-use and "Advance 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).

---

<sup>22</sup> Commission Delegated Regulation (EU) 2022/699 of 3 May 2022 amending Regulation (EU) 2021/821 of the European Parliament and of the Council by removing Russia as a destination from the scope of Union general export authorisations

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

*Last update: 16 October 2025*

Yes. Articles 2(1a) and 2a(1a) of the Sanctions Regulation prohibit the transit via the territory of Russia of dual-use goods listed in Annex I to Regulation 2021/821 and advanced technology items listed in Annex VII to the Sanctions Regulation exported from the Union.

Articles 2(3a), 2(4a), 2a(3a) and 2a(4a) provide for two limited exemptions and five derogations from the prohibition to transit through Russia applicable to dual-use goods and advanced technology items. The exemptions under Articles 2(3a) and 2a(3a) cover:

- 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; or
- Medical or pharmaceutical purposes provided that they are not listed in Annex XL to the Russia Sanctions Regulation.

The derogations available in Articles 2(4a) and 2a(4a) apply to:

- intergovernmental cooperation in space programmes;
- the operation, maintenance, fuel reprocessing and safety of civil nuclear capabilities, as well as civil nuclear cooperation, in particular in the field of research and development;
- maritime safety;
- civilian non-publicly available electronic communications networks which are not the property of an entity that is publicly controlled or with over 50 % public ownership;
- 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;
- the diplomatic representations of the Union, Member States and partner countries, including delegations, embassies and missions;
- 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;
- the exclusive use and under the full control of the authorising Member State and in order to fulfil its maintenance obligations in areas which are under a long-term lease agreement between that Member State and the Russian Federation – please note that derogation solely applies to Article 2a;
- software updates;
- use as consumer communication devices; or
- medical or pharmaceutical purposes, provided that they are listed in Annex XL to the

**43. 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?**

*Last update: 16 March 2022*

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 35.

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.

**44. To what extent EU exporters should ensure that no sanctioned entity or person is involved in any way in their business operations? Should they go beyond first tier suppliers and customers?**

*Last update: 10 October 2022*

See Section 2. ‘Circumvention and Due Diligence’ of the Commission FAQs on the implementation of Council Regulation No 833/2014 and Council Regulation No 269/2014, in particular: questions No 1-2; 4; 6. EU exporters can also seek the advice and support of National Competent Authorities to ensure compliance with EU restrictive measures as well as to obtain information on specific business situations.

**45. 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?**

*Last update: 16 March 2022*

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.

**46. 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?**

*Last update: 2 October 2023*

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, the 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.

Moreover, the Commission services, in coordination with international partners, have identified a number of dual-use goods and advanced technology items whose export to Russia is prohibited under Regulation 833/2014 used in Russian military systems found on the battlefield in Ukraine or critical to the development, production or use of those Russian military systems. These items include electronic components such as integrated circuits and radio frequency transceiver modules, as well as items essential for the manufacturing and testing of electronic components of printed circuit boards retrieved from the battlefield.

These battlefield items have been grouped into a list of Common High Priority Items, which can be found in Annex II to this FAQ. The List may support due diligence and effective compliance by exporters and targeted anti-circumvention actions by customs and enforcement agencies of



partner countries determined to prevent that their territories are being abused for circumvention of EU sanctions purposes.

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

*Last update: 16 March 2022*

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.

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

*Last update: 16 March 2022*

Under the 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.

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

*Last update: 16 March 2022*

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

**50. What documentation needs to accompany a shipment of goods to ensure that it is not stopped on the way by the customs?**

*Last update: 10 October 2022*

The export and re-export of goods from the EU to a non-EU country are subject to customs formalities, i.e. they have to be accompanied by certain customs documents. Thus, Union goods to be exported to Russia, or non-Union goods to be re-exported to Russia have to be covered by an export or a re-export declaration, respectively.

Where the goods fall within the scope of the sanctions against Russia and their movement is subject to an export authorisation in accordance with the Sanctions Regulation, the exporter has to possess an authorisation also in that respect, accompanied by the customs declaration.

Where certain goods or shipments are exempted from the sanctions in place and the Sanctions Regulation does not provide for specific supporting documentation as proof of the exemption, the form or type of such supporting documentation may be determined by national competent authorities. Therefore, the economic operators concerned are strongly recommended to consult with their competent authorities, in order to identify the documents which need to accompany the shipments of goods affected by the Sanctions Regulation.

**51. I intend to export an item to Russia which is listed in several Annexes to the Russia Sanctions Regulation. How am I supposed to notify or apply in such a situation?**

*Last update: 16 October 2025*

Exporters intending to export an item to Russia which is listed in several Annexes to the Russia Sanctions Regulation will have to respect all obligations in relation to the various Annexes which might list such an item. One pertinent example would be heat exchangers which are listed under Annexes VII and XXIII to the Russia Sanctions Regulation. In such a case, exporters will have to notify and apply the export prohibitions or request authorisations for such items in accordance with the procedures foreseen for each Annex.

## **WORK WITH PARTNER COUNTRIES**

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

*Last update: 16 March 2022*

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 has been 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.

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

*Last update: 6 July 2023*

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 21 July 2022, it includes the U.S., Japan, the United Kingdom, South Korea, Australia, Canada, New Zealand, Norway and Switzerland. 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 exemption 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.

#### **54. Is the US exempting the EU from its extraterritorial export controls?**

*Last update: 16 March 2022*

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 U.S. will not apply extraterritorial controls to items, where the 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 Articles 2(7) and 2a(7) of the Sanctions Regulation.

## OTHER MISCELLANEOUS QUESTION

### **55. Is Belarus covered by the Sanctions Regulation?**

*Last update: 16 March 2022*

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 I – Indicative temporary correlation table for items listed in Annex VII to the Sanctions Regulation**

### **ANNEX VII TO REGULATION (EU) 2022/1904**

#### **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) 833/2014 and its amendments, 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 2023 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) [[Access here](#)]**

*Last update: 16 October 2025*

## **Annex II – List of Common High Priority Items**

*Last update: 22 February 2024*

The EU and its international partners responded to Russia's war of aggression against Ukraine on 24 February 2022 with massive and comprehensive restrictive measures. The sectoral sanctions aim at curtailing Russia's ability to wage the war, depriving it of critical technologies and markets and significantly weakening its industrial base.

These sanctions against Russia have sharpened and extended export controls on dual-use goods and advanced technology items to target sensitive sectors in Russia's military industrial complex and to limit its access to crucial advanced technology.

The European Commission services, in coordination with the competent authorities in the US, the UK and Japan, have identified a number of dual-use and advanced technology items used in Russian military systems found on the battlefield in Ukraine or critical to the development production or use of those Russian military systems. These items include electronic components such as integrated circuits and radio frequency transceiver modules, as well as items essential for the manufacturing and testing of the electronic components of the printed circuit boards retrieved from the battlefield.

These battlefield items have been grouped into a list of Common High Priority Items, which can be found in the Annex to this Guidance Note. The List may support due diligence and effective compliance by exporters and targeted anti-circumvention actions by customs and enforcement

agencies of partner countries determined to prevent that their territories are being abused for circumvention purposes.

The List of Common High Priority Items is divided into four Tiers containing a total of 50 (Harmonised System codes) dual-use and advanced technology items sanctioned under the Russia Sanctions Regulation and involved in Russian weapons systems used against Ukraine, including e.g. the Kalibr cruise missile, the Kh-101 cruise missile, the Orlan-10 UAV and the Ka-52 “Alligator” helicopter.

The list is divided into four Tiers:

- **Tier 1** comprises four HS codes which describe integrated circuits (also referred to as microelectronics);
- **Tier 2** comprises five HS codes containing electronics items related to wireless communications, satellite-based radio-navigation and passive electronic components;
- **Tier 3** is itself divided in two sets:
  - Tier 3.A, which comprises 16 HS codes containing discrete electronic components, electrical plugs and connectors, navigation equipment and digital cameras.
  - Tier 3.B, which lists nine HS codes used to export mechanical and non-electronic components, such as bearings and optical components; and
- **Tier 4** is divided in two sets:
  - Tier 4.A, which includes 11 HS codes concerning manufacturing equipment for production and quality testing of electric components and circuits.
  - Tier 4.B, which lists 5 HS codes concerning Computer Numerical Control (CNC) machine tools for the manufacturing of complex high precision metal components.

The List is not static and will be periodically adjusted in the light of what is found in Russian military systems on the battlefield and Russia’s use of sanctioned sensitive items. It replaces the previous September 2023 version.

## **TIER 1**

<b>HS code (4)</b>	<b>Text</b>
8542.31	Electronic integrated circuits: Processors and controllers, whether or not combined with memories, converters, logic circuits, amplifiers, clock and timing circuits, or other circuits
8542.32	Electronic integrated circuits: Memories
8542.33	Electronic integrated circuits: Amplifiers
8542.39	Electronic integrated circuits: Other

**TIER 2**

<b>HS code (5)</b>	<b>Text</b>
8517.62	Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus
8526.91	Radio navigational aid apparatus
8532.21	Other fixed capacitors: Tantalum capacitors
8532.24	Other fixed capacitors: Ceramic dielectric, multilayer
8548.00	Electrical parts of machinery or apparatus, not specified or included elsewhere in chapter 85

**TIER 3.A**

<b>HS code (16)</b>	<b>Text</b>
8471.50	Processing units other than those of subheading 8471 41 or 8471 49, whether or not containing in the same housing one or two of the following types of unit: storage units, input units, output units
8504.40	Static converters
8517.69	Other apparatus for the transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless network
8525.89	Other television cameras, digital cameras and video camera recorders
8529.10	Aerials and aerial reflectors of all kinds; parts suitable for use therewith
8529.90	Other parts suitable for use solely or principally with the apparatus of headings 8524 to 8528
8536.69	Plugs and sockets for a voltage not exceeding 1 000 V
8536.90	Electrical apparatus for switching electrical circuits, or for making connections to or in electrical circuits, for a voltage not exceeding 1000 V (excluding fuses, automatic circuit breakers and other apparatus for protecting electrical circuits, relays and other switches, lamp holders, plugs and sockets)
8541.10	Diodes, other than photosensitive or light-emitting diodes (LED)
8541.21	Transistors, other than photosensitive transistors with a dissipation rate of less than 1 W
8541.29	Other transistors, other than photosensitive transistors
8541.30	Thyristors, diacs and triacs (excl. photosensitive semiconductor devices)
8541.49	Photosensitive semiconductor devices (excl. Photovoltaic generators and cells)
8541.51	Other semiconductor devices: Semiconductor-based transducers
8541.59	Other semiconductor devices
8541.60	Mounted piezo-electric crystals



**TIER 3.B**

<b>HS code (9)</b>	<b>Text</b>
8482.10	Ball bearings
8482.20	Tapered roller bearings, including cone and tapered roller assemblies
8482.30	Spherical roller bearings
8482.50	Other cylindrical roller bearings, including cage and roller assemblies
8807.30	Other parts of aeroplanes, helicopters or unmanned aircraft
9013.10	Telescopic sights for fitting to arms; periscopes; telescopes designed to form parts of machines, appliances, instruments or apparatus of this chapter or Section XVI
9013.80	Other optical devices, appliances and instruments
9014.20	Instruments and appliances for aeronautical or space navigation (other than compasses)
9014.80	other navigational instruments and appliances

**TIER 4.A**

<b>HS code (11)</b>	<b>Text</b>
8471.80	Units for automatic data-processing machines (excl. processing units, input or output units and storage units)
8486.10	Machines and apparatus for the manufacture of boules or wafers
8486.20	Machines and apparatus for the manufacture of semiconductor devices or of electronic integrated circuits
8486.40	Machines and apparatus specified in note 11(C) to this chapter
8534.00	Printed circuits
8543.20	Signal generators
9027.50	Other instruments and apparatus using optical radiations (ultraviolet, visible, infrared)
9030.20	Oscilloscopes and oscillographs
9030.32	Multimeters with recording device
9030.39	Instruments and apparatus for measuring or checking voltage, current, resistance or electrical power, with recording device
9030.82	Instruments and apparatus for measuring or checking semiconductor wafers or devices

**TIER 4.B**

<b>HS code (5)</b>	<b>Text</b>
8457.10	Machining centres for working metal
8458.11	Horizontal lathes, including turning centres, for removing metal, numerically controlled

8458.91	Lathes (including turning centres) for removing metal, numerically controlled (excluding horizontal lathes
8459.61	Milling machines for metals, numerically controlled (excluding lathes and turning centres of heading 8458, way-type unit head machines, drilling machines, boring-milling machines, boring machines, and knee-type milling machines)
8466.93	Parts and accessories suitable for use solely or principally with the machines of headings 8456 to 8461, n.e.s