

# IMPORT BAN ON REFINED PRODUCTS OBTAINED FROM RUSSIAN CRUDE OIL

*RELATED PROVISION: ARTICLE 3ma OF COUNCIL REGULATION 833/2014*  
FREQUENTLY ASKED QUESTIONS – AS OF 29 OCTOBER 2025

## 1. What evidence is needed for operators to prove that no Russian crude oil was used for refining to obtain petroleum products that are to be imported into the EU?

*Last update: 16 October 2025*

Operators should have in place **adequate due diligence** procedures to ensure that no Russian crude oil falling under CN code 2709 00 was used in the production of petroleum products falling under CN code 2710 imported into the Union.

Operators are expected to provide to customs all relevant information necessary to identify the origin of the crude oil used in the production of the petroleum products, including appropriate evidence on the country where the crude oil used has been extracted, with the exception where the petroleum products are imported from a partner country listed in Annex LI of Council Regulation (EU) No 833/2014 (see FAQ3 below). Net exporters of crude oil in the previous calendar year benefit from the presumption that petroleum products having the non-preferential origin of these jurisdictions have been obtained from domestic crude oil and not from crude oil originating in Russia (see FAQ4 below).

For the purpose of assessing whether petroleum products are obtained from crude oil of Russian origin, importers may reasonably rely upon any documentation providing evidence on the origin of the crude oil from which it has been processed but should exercise caution if they have reasons to believe that such documentation has been falsified or is otherwise erroneous.

Operators are advised to insert **contractual clauses** with their supplier in the purchase contract of imported products. Such a clause would contain a guarantee (e.g. requesting an attestation of assurance) of non-Russian crude oil origin, giving rise to liability of the latter if it is established that Russia crude oil was used for refining of the imported products.

The contractual clause would need to be in place at the latest at the time of the import, purchase or transfer of the relevant petroleum products. Operators should exercise **enhanced due diligence** especially in cases where:

- Shipments come from **Türkiye, India or China**, given their increased imports of Russian crude oil since the start of Russia's full-scale invasion of Ukraine. The likelihood of importing refined products made from Russian crude is therefore higher.
- Shipments come from **countries which are known for mixing crude of various origins** in view of refining petroleum products. In such a case, verifying the origin of the crude oil may prove challenging.

Importers or traders should share the necessary information to identify the origin of the crude oil used in the production of the petroleum products, including appropriate evidence on the country where the crude oil used has been extracted with other participants in the oil trade, such as financial institutions, insurers or brokers.

**2. If a refinery refines Russian crude oil and also other crudes, can an EU operator import from this refinery without violating the ban in Article 3ma?**

*Last update: 16 October 2025*

When dealing with refineries that process any quantity of Russian crude oil, segregated or blended with other crudes, operators should exercise **enhanced due diligence**.

Oil is a fungible material that cannot be physically segregated once mixed. This means if Russian oil and oil from other origins are mixed in a tank which is used for refining, it is impossible to certify the origin of all crude molecules imported into the EU.

There are three possible scenarios:

1. If Russian crude oil can be segregated and processed separately by the refinery, import into the EU is allowed, subject to proving that the petroleum product exported to the EU comes from the 'production line' using non-Russian oil. Third-country refineries may issue such an attestation, which may serve as supporting evidence. Such segregation should be clearly documented. EU operators may ask their counterparts to provide additional documentary evidence to verify such segregation (proof of technical installations and adaptations thereto, records of vessels delivering crude in the past months etc.).
2. If Russian crude oil cannot be segregated and processed separately by the refinery, but evidence is provided by the third party that no Russian crude has been received or processed in the 'production line' over the past 60 days prior to the bill of lading date of the cargo at issue, import into the EU is allowed. Third-country refineries may issue such an attestation, which may serve as supporting evidence. EU operators may ask their counterparts to provide additional documentary evidence (records of vessels delivering crude in the past months etc.).
3. If Russian crude oil cannot be segregated and processed separately because of technical constraints or if EU operators are unable to get reasonable assurance that such crude oil is processed separately, then no import into the EU is allowed.

Petroleum products of non-Russian origin that contain a *de minimis* amount of Russian oil left over from a container or tank (tank heel or an unpumpable quantity of substance which cannot be removed from a container without causing damage to the container) should not be considered Russian origin oil and thus should not be subject to the prohibition

A mass-balancing approach whereby a third country refinery would show that it uses the Russian crude oil for domestic consumption and the non-Russian crude oil for export purposes on an aggregate basis is not accepted, as it would not be in line with the objectives of the ban which is to reduce Russia's revenues related to oil.

**3. Does an operator need to provide to customs evidence of the origin of the crude oil falling under CN code 2709 00 from which the refined product is obtained, if it imports diesel or another petroleum product from a partner country (Canada, Norway, USA, UK, Switzerland, Australia, Japan, New Zealand)?**

*Last update: 29 October 2025*

No, these are partner countries according to Article 3ma(1) and Annex LI. When refined products are imported from any partner countries as specified in Annex LI, no evidence needs to be provided on the origin of the crude oil from which the petroleum product is obtained.

**4. Which are the third countries which are net exporters of crude oil in the previous calendar year (2024) that benefit from the presumption that petroleum products having the non-preferential origin of these jurisdictions have been obtained from domestic crude oil and not from crude oil originating in Russia?**

*Last update: 29 October 2025*

Table of net-exporter countries of crude oil for 2024:

| COUNTRY                          |
|----------------------------------|
| Afghanistan*                     |
| Albania                          |
| Algeria                          |
| Angola                           |
| Antigua and Barbuda*             |
| Argentina                        |
| Azerbaijan                       |
| Bahamas*                         |
| Barbados*                        |
| Belize*                          |
| Bhutan*                          |
| Bolivarian Republic of Venezuela |
| Brazil                           |
| Burkina Faso*                    |
| Burundi*                         |
| Cabo Verde*                      |
| Cambodia                         |
| Cameroon                         |
| Central African Republic*        |
| Chad*                            |
| Colombia                         |
| Comoros*                         |
| Democratic Republic of the Congo |
| Djibouti*                        |
| Dominica*                        |
| Ecuador                          |
| Egypt                            |
| Equatorial Guinea                |
| Fiji*                            |
| Gabon                            |

|                                   |
|-----------------------------------|
| Gambia*                           |
| Ghana                             |
| Grenada*                          |
| Guatemala                         |
| Guinea*                           |
| Guinea-Bissau*                    |
| Guyana                            |
| Iraq                              |
| Islamic Republic of Iran          |
| Kazakhstan                        |
| Kiribati*                         |
| Kuwait                            |
| Lesotho*                          |
| Liberia*                          |
| Libya                             |
| Malawi*                           |
| Maldives*                         |
| Mali*                             |
| Mauritania*                       |
| Mexico                            |
| Mongolia                          |
| Mozambique                        |
| Myanmar                           |
| Nigeria                           |
| Oman                              |
| Palau*                            |
| Papua New Guinea*                 |
| Qatar                             |
| Republic of Moldova               |
| Republic of the Congo             |
| Saint Kitts and Nevis*            |
| Saint Lucia*                      |
| Saint Vincent and the Grenadines* |
| Samoa*                            |
| Sao Tome and Principe*            |
| Saudi Arabia                      |
| Seychelles*                       |
| Sierra Leone*                     |
| Solomon Islands*                  |
| Somalia*                          |
| South Sudan                       |
| Sudan                             |
| Timor-Leste*                      |
| Tonga*                            |
| Trinidad and Tobago               |

|                      |
|----------------------|
| Tunisia              |
| Turkmenistan         |
| United Arab Emirates |
| Vanuatu*             |

\* Countries for which only aggregated data across multiple countries is available

To establish the list of net exporter countries of crude oil, the European Commission used data from the International Energy Agency (IEA) to determine the net trade flow of third countries. When available (for all OECD countries and a selection of non-OECD countries), data from 2024 was used. This was complemented with 2023 figures for those countries where data for 2024 is not yet available. The table will be updated once a year in order to establish the list based on the previous calendar year.

For certain countries, typically small in size, IEA does not collect data at the individual country level, but only aggregated across multiple countries, such as for example: non-OECD Asia, non-OECD Americas, etc. For those countries, the European Commission assumes that all countries in an aggregated group share the same status as the group in aggregate, i.e. if the group of countries in aggregate is net exporter of crude oil, all countries in the group are classified as such, unless there are indications that the country or a specific refinery in that third country started or continued receiving Russian crude oil for refining in a significant or disproportionate manner. Please see for more information FAQ6 and FAQ7.

This methodology allows to cover 161 non-EU countries recognised by the United Nations (UN). There are 5 countries recognised by the UN<sup>1</sup> for which IEA does not have any data, either individually or aggregated. As it is not possible to establish their net trade flow, those countries will not benefit from the presumption of not being obtained from Russia crude oil. However, these countries are very small and are unlikely to have any meaningful trade of petroleum products with the EU.

##### **5. What evidence on the origin of the crude oil does an importer into the EU of diesel or another petroleum product need to show when importing from a net exporter country of crude oil in the previous calendar year?**

*Last update: 16 October 2025*

In such cases, the petroleum products benefit from a presumption that they have been made from crude oil produced in the country. It is sufficient that the importer provides evidence of the origin of the petroleum product itself (from a net exporter of crude oil), without having to provide evidence of the origin of the upstream crude oil.

However, should national competent authorities have reasonable grounds to believe that petroleum products to be imported are not made from crude oil originating in that country, they may request importers provide evidence of the origin of the crude oil used. Importers should then provide documentation in line with answer to FAQ 1. This could be the case if the national authorities have received indications that the country started receiving Russian crude for refining in a disproportionate manner. Please see for more information FAQ6.

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<sup>1</sup> Andorra, Marshall Islands, Micronesia, Nauru, and Tuvalu.

It has to be noted that in any event, whenever they consider it is justified, customs can request for additional documentation in accordance with Article 188.a of the Union Customs Code (UCC) in addition to being able to conduct the controls that they deem necessary under Article 46.1 of the UCC.

**6. The presumption for net oil exporters can be rebutted if a competent authority of a Member State has reasonable grounds to believe that the petroleum products to be imported have been obtained from Russian crude oil. What is understood under such reasonable grounds?**

*Last update: 16 October 2025*

This could be the case if national authorities, in this case customs authorities, have received indications that the country or a specific refinery in a third country started or continued receiving Russian crude oil for refining in a significant or disproportionate manner.

Additionally, this could also happen if national authorities become aware that Russia or other third countries refining Russian oil are using countries which are net exporters of crude as an export hub and fraudulently labelling the petroleum product as originating in the net exporter country.

Information from various sources should be taken into consideration, including trade flows and vessel movements.

At the same time, the presumption should hold unless the reasonable grounds are based on significant evidence showing a disproportional peak in imports of Russian crude, as the objective of the presumption is to ease the administrative burden on both customs authorities and importers in order to avoid unintended consequences on EU's security of supply by overcompliance with prohibitions in Article 3ma.

**7. Does the specific documentary requirements of Article 3ma apply for oil products imported from net oil exporting countries which do not import significant amounts of Russian crude oil but which import significant or fast rising quantities of Russian oil products of CN code 2710?**

*Last update: 16 October 2025*

No. However, in case a net crude oil exporting country imports significant or sharply increasing quantities of oil products of CN code 2710, there is a risk that oil products from Russia could be blended there with domestically obtained oil products to circumvent the prohibition of import contained in Article 3m. In this case particular due diligence should be exercised by importers to be certain that the oil products imported from these net crude oil exporting countries do not contain Russian oil products.

Please see the notice to operators of 3 August 2022 on “Imports of Russian crude oil or petroleum products into the Union”<sup>2</sup>, as well as Frequently Asked Questions on Oil Imports<sup>3</sup> for more details.

**8. Does the prohibition on “purchase, import or transfer” in Article 3ma apply strictly and only to products destined into EU?**

*Last update: 16 October 2025*

Yes. The objective of the provision is to limit imports of Russian crude oil ‘through the back door’ into the EU. It should not affect the purchase, import into third countries or transfer by EU operators of such products to third countries, including transit through EU waters.

**9. Can a vessel transporting goods potentially subject to prohibitions in Article 3ma access EU ports in case of emergency?**

*Last update: 16 October 2025*

Yes. A vessel transporting petroleum products made of Russian crude can access an EU port if it is in need of assistance, seeking a place of refuge, for an emergency port call or for reasons of maritime safety, or for saving life at sea.

**10. Does bunkering fall under Article 3ma? What about jet fuel on board aircraft flying from third countries into the EU?**

*Last update: XX October 2025*

The objective of the provision is to limit imports of Russian crude oil through the back door into the EU.

In order not to impose a disproportionate burden, EU vessels are not required to verify the origin of the crude oil used for processing of the bunker fuel, as long as the bunker fuel is required for the operation of the tanker pursuing the voyage.

The import, purchase or transfer of bunker fuel beyond the operation of the tanker pursuing a voyage is subject to the rules applicable to any other petroleum product, see FAQ1.

The same would apply to an aircraft operating a flight between a third country and the EU. The prohibition in Article 3ma does not apply to the fuel transported in its fuel tank(s) provided the fuel is used only for the flight of the aircraft and not to circumvent the prohibition.

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<sup>2</sup> 2022/C 296/05, <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A52022XC0803%2801%29>

<sup>3</sup> [Oil imports - European Commission](#)

**11. Are oils and other products classified under CN code 2707 which are produced using Russian origin crude oil (CN code 2709 00) subject to the prohibitions set out in Article 3ma?**

*Last update: 16 October 2025*

No, the prohibitions apply only petroleum products classified as CN code 2710 which are produced using Russian origin crude oil (CN code 2709 00).