IMPORT BAN ON REFINED PRODUCTS OBTAINED FROM RUSSIAN CRUDE OIL

RELATED PROVISION: ARTICLE 3ma OF COUNCIL REGULATION 833/2014

FREQUENTLY ASKED QUESTIONS – AS OF 15 JUNE 2026

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: 15 June 2026

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, applicable to petroleum products discharging in the Union:

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.). As additional supporting evidence, third country refineries may be asked to show that – over the 60-day period prior to the bill of lading date of the cargo at issue – the total volume of Russian crude imported to the refinery site **does not exceed** the capacity of the processing line dedicated to domestic/non-EU consumption ('volume-based control check'). See more details below.
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 by stopping any EU support to the Russian oil business, even indirectly through the purchase of petroleum products made of Russian crude oil. The volume-based control check under scenario 1 does not equate to a mass-balancing approach in that the volume-based control check is not sufficient by itself to prove the non-Russian origin of the crude oil.

This should be accompanied by documentary evidence that certifies the segregation of the production lines (see below).

Where a refinery is asked to provide evidence following the volume-based control check under Scenario 1, the following principles should apply:

Over the 60-day period prior to the loading of any cargo intended or bound for the Union, the total volume of Russian crude oil imported to the refinery site should not exceed the throughput capacity (as publicly stated) of the processing line using Russian crude oil for domestic or non-EU consumption. The balance — i.e. the throughput capacity of the processing line from which export cargoes to the EU are sourced — should be fed exclusively with non-Russian crude oil.

For example, if a segregated refinery has a total crude distillation capacity of 1,200,000 barrels per day, configured as follows: line A (domestic/non-EU): 400,000 bpd nameplate capacity and line B (export): 800,000 bpd nameplate capacity,

- Over the 60 days prior to the loading of a Union-bound cargo, the refinery may receive Russian crude oil up to a volume equivalent to 60 days × 400,000 bpd = 24,000,000 barrels.
- Russian crude oil deliveries beyond this volume imply that the excess Russian crude oil was processed in the export production line.
- Product from that refinery would not be eligible for import into the Union until a new 60-day interval during which 24,000,000 barrels or fewer of Russian crude imports has been observed.
- The 60-day period is a rolling window that advances daily.

The EU operator should obtain and retain:

- directly from the refiner or from public sources, the effective throughput capacity data for each production line at the refinery, confirmed where possible by an independent surveyor or by reference to independent industry data;
- from public sources or independent agencies, records of all crude oil deliveries to the refinery site over the relevant 60-day period, including vessel names, bill of lading dates, volumes and declared origins;
- the refinery's attestation that Russian crude oil imports during the period did not exceed the capacity of the production line that supplies domestic/non-EU markets; and
- independently verified evidence that (i) the inbound and outbound logistics of the export production line are segregated from the other (domestic/non-EU) production line; (ii) all isolation measures (blinds, spools, valve locks) are in place and effective; and (iii) the control systems logics prevents routings between the two production lines. An initial verification should be followed by re-confirmation at a stated interval (e.g. monthly or following any material change to the refinery's configuration).

Any material change in the published or reported nameplate capacity of either production line should be notified by the refinery to the EU operator and reflected in subsequent attestations.

The segregated refinery operator should provide a written attestation for each export cargo in the following form, or in a form containing equivalent information:

> *"We, [name of refinery], confirm that in the 60-day period from [dd/mm/yyyy] to [dd/mm/yyyy], being the 60 days prior to the bill of lading date of MV [vessel name] carrying [product] for [EU discharge port], we received the following crude oil deliveries:*
>
> *Russian crude oil: [volume] barrels*
>
> *Non-Russian crude oil: [volume] barrels*

The Russian crude oil received during this period was processed in Production Line [A/identifier], which has a nameplate throughput capacity of [volume] barrels per day ([volume] barrels over 60 days). The volume of Russian crude oil received during this period did not exceed the throughput capacity of that production line.

Accordingly, all crude oil processed in Production Line [B/identifier], from which the above cargo was produced, was non-Russian crude oil. The petroleum products comprising this cargo were not obtained from crude oil originating in Russia.

Signed: __________ Name: __________ Position: __________ Date: __________"

The attestation should be provided to the EU importer in advance of discharge and be available, upon request, to EU customs authorities.

Independent verification carried out for the purposes outlined in this section should be carried out by a surveying or inspection company that (i) is established and licensed or accredited in an EU or OECD member state, (ii) has a good track record of operating in the petroleum inspection sector, and (iii) is not owned by, controlled by or otherwise affiliated with the refinery operator or its parent company, or by any entity subject to EU restrictive measures.

With respect to export cargoes for importation into the EU which have a bill of lading date after [the date of this guidance], the evidence of technical segregation referred to in this section (i.e. the report or other material provided by the surveying or inspection company referred to above) should be dated no more than 30 calendar days prior to the date of that bill of lading.

The volume-based control check may also be applied to products discharged prior to the issuance of this guidance, provided that operators can demonstrate adequate supporting historical evidence.

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[1] 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.

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

[1] Andorra, Marshall Islands, Micronesia, Nauru, and Tuvalu.

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"[2] , as well as Frequently Asked Questions on Oil Imports[3] 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

[2] 2022/C 296/05, https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A52022XC0803%2801%29
[3] Oil imports - European Commission

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: 16 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.

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).