



An Roinn Fiontar,
Trádála agus Fostaíochta
Department of Enterprise,
Trade and Employment

Guidance Note:

EU Trade Sanctions in response to Russia's aggression against Ukraine

10 March 2022



Introduction

The Government is monitoring Russia's illegal and unprovoked military aggression against Ukraine and considering the humanitarian and economic implications of the conflict on an ongoing basis.

The Department of Enterprise, Trade and Employment, through its Trade Licensing and Control Unit is responsible for the implementation of trade sanctions in accordance with Ireland's international commitments and obligations as a member of the EU. This Guidance Notice summarises the key trade provisions of the EU sanctions which were adopted between 23rd February and 9th March 2022.

It is provided for information purposes only and does not constitute a legal interpretation of the EU Regulations.

Traders should consult the [EU Regulations directly](#), and when necessary, obtain professional advice.

This Notice will be regularly reviewed, and while every effort has been made to ensure that the following information is accurate, the situation is very dynamic and the sanctions, including the lists of prohibited goods, are liable to change.



Ukraine

The following activities are **prohibited** in respect of territories of **Donetsk and Luhansk**:

- **Import** *any* goods originating in the territories.
- **Sell, supply, transfer, or export** *specified* goods and technology suited for use in the **telecommunications, transport, energy** and **oil production** sectors to the territories.
- Provide **technical assistance** or **brokering services** related to the *specified* goods and technology, or related to the **provision, manufacture, maintenance** and **use** of such items.

Provide **technical assistance, brokering, construction** or **engineering services** directly relating to **infrastructure** in these sectors.



Russia

It is **prohibited to sell, supply, transfer or export** the following categories of goods to Russia, or for use in Russia:

- **Dual-use** goods and technology*,
- Specific goods and technology** which might contribute to Russia's **military** and **technological enhancement**,
- Specific goods and technology, suited for use in **oil refining**,
- Specific goods and technology suited for use in **aviation** or **space industry**,
- Specific **maritime** navigation and radio goods and technology, including for placing on board of a Russian-flagged vessel.

There are corresponding prohibitions on the provision of **technical assistance**, **brokering services** or **other services**, including **financial services**, related to these categories of goods.

*Items which have civilian and military applications – listed in Regulation (EU) 2021/821.

**Items are listed in the Regulation and span Electronics; Computers; Telecommunications and Information Security; Sensors and Lasers; Navigation and Avionics; Marine; and Aerospace and Propulsion.



Russia – Aircraft

- It is prohibited to sell, supply, transfer or export **“aircraft, spacecraft or parts thereof”**, to Russia or for use in Russia.
- It is prohibited to provide **technical assistance, brokering services or other services**, including **insurance** and **reinsurance**, in relation to aircraft.
- It is prohibited to provide **overhaul, repair, inspection, replacement, modification or defect rectification** services for an aircraft or component.



Belarus

It is prohibited to **import specified:**

- **'Potash'** products,
- **Mineral** products (including **Petroleum**),
- **Wood** products,
- **Cement** products,
- **Rubber** products,
- **Iron** and **Steel** products

It is prohibited to **sell, supply, transfer or export** specified:

- **Dual-use** goods,
- Goods which might contribute to Belarus' **military** and **technological enhancement**,
- Specified goods for the production of **Tobacco** products,
- Specified **machinery**,
- Goods for **internal repression**,
- Goods for **electronic interception** (surveillance).



Exemptions

- The EU Regulations sets out specific grounds on which the exporters can avail of, or apply for, a partial or temporary derogation from the prohibitions.
- These grounds for eligibility include humanitarian, medical applications, maritime safety, software updates, and for the execution of contracts entered into prior to the sanctions coming into effect.
- The requirements to avail of a derogation are precise and vary depending on the derogation being sought. Traders should closely study the details in the relevant EU Regulation.



Further Information

National

The Department updates its website with the [latest EU trade sanctions](#) in response to situation in Ukraine, which includes links to the EU Regulations.

Specific inquiries or requests for derogation should be submitted to exportcontrol@enterprise.gov.ie

EU

The European Commission maintains an interactive [global map of all EU Sanctions](#)

The Commission is also currently preparing a Guidance Document/FAQ for Traders.