

EU Publishes Fifth Package of Sanctions Against Russia

The EU published its fifth package of sanctions against Russia on April 8, 2022.¹ The package contains the following six elements:²

Coal ban

- An import ban on all forms of Russian coal. This affects one fourth of all Russian coal exports, amounting to around €8 billion loss of revenue per year for Russia.

Financial measures

- A full transaction ban and asset freeze on four Russian banks, which are now totally cut off from the markets.
- A prohibition on providing high-value crypto-asset services to Russia.
- A prohibition on providing advice on trusts to wealthy Russians.

Transport

- A full ban on Russian and Belarusian freight road operators working in the EU. Certain exemptions cover essentials, such as agricultural and food products, humanitarian aid as well as energy.
- An entry ban on Russian-flagged vessels to EU ports. Exemptions apply for medical, food, energy, and humanitarian purposes, amongst others.

Targeted export bans

- Further targeted export bans. This includes, for example, quantum computing, advanced semiconductors, sensitive machinery, transportation and chemicals. It also includes specialist catalysts for use in the refinery industry.

¹ European Commission press release, Ukraine: EU agrees fifth package of restrictive measures against Russia (Apr. 8, 2022).

² The elements are contained in the consolidated version of Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 78, 17.3.2014, p. 6–15; and Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 229, 31.7.2014, p. 1–11

- Adding jet fuel and fuel additives.

Extending import bans

- Additional import bans – worth €5.5 billion - including cement, rubber products, wood, spirits (including vodka), liquor, high-end seafood (including caviar), and an anti-circumvention measure against potash imports from Belarus.

Excluding Russia from public contracts and European money; legal clarifications and enforcement

- Full prohibition on the participation of Russian nationals and entities in procurement contracts in the EU. Limited exceptions may be granted by the competent authorities where there is no viable alternative.
- Restriction on financial and non-financial support to Russian publicly owned or controlled entities under EU, Euratom and Member State programmes (e.g. Horizon 2020).
- Extending to all official EU currencies the prohibitions on the export of banknotes and on the sale of transferrable securities.

The sanctions package includes listings of 217 additional individuals and 18 entities. In total, 1091 individuals and 80 entities have been sanctioned since 2014.

About Curtis

Curtis, Mallet-Prevost, Colt & Mosle LLP is a leading international law firm. Headquartered in New York, Curtis has 19 offices in the United States, Latin America, Europe, the Middle East and Asia. Curtis represents a wide range of clients, including multinational corporations and financial institutions, governments and state-owned companies, money managers, sovereign wealth funds, family-owned businesses, individuals and entrepreneurs.

For more information about Curtis, please visit www.curtis.com.

Attorney advertising. The material contained in this Client Alert is only a general review of the subjects covered and does not constitute legal advice. No legal or business decision should be based on its contents.

Please feel free to contact any of the persons listed below if you have any questions on this important development:



Elena Klonitskaya

Partner
eklonitskaya@curtis.com
Brussels: +32 474 42 75 77



Ana Amador

Associate
aamador@curtis.com
Washington: +1 202 452 7366