

The EU's sixth package of sanctions against Russia

15 June 2022

On the 3rd June 2022 the European Council decided on a sixth package of sanctions to be imposed on Russia and Belarus in light of the ongoing war against Ukraine. We summarise the adopted measures below.

Expanded list of individuals and companies

- Restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine

The new [Council Decision \(CRSP\) 2022/883](#) amends [Council Decision \(CFSP\) 2014/145](#) adding military personnel, responsible for crimes committed against Ukrainian civilians in Bucha and Mariupol, to the list of persons, entities and bodies subject to restrictive measures set out in the [Annex to Council Decision 2014/145](#).

Government officials, family members, oligarchs and businesspeople supporting the war have been listed, as well as numerous entities. These include companies supplying the Russian military, such as military power supplier JSC Oboronenergo; Russian car manufacturer OJSC Ulyanovsk; telecommunication service provider JSC Voentelecom; clothing manufacturer Voentestilprom LLC; Russian defense industry insurer Independent Insurance Group; military equipment and vehicle developer and manufacturer PJSC Kamaz; software developer JSC Kronshtadt; tyre producers Nizhekamsk All-Steel Tyre Plant LLC and PJSC Nizhnekamskshina; aircraft manufacturer JSC Sukhoi Company.

Moreover, National Settlement Depository (*NSD*), which is the largest securities depository in Russia and is 99,997% owned by Moscow Exchange, has been included in the list for supporting materially or financially the Government of the Russian Federation.

- Restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine

The new [Implementing Regulation \(EU\) 2022/876](#) expands the list of individuals and companies subject to sanctions by amending [Annex I to Council Regulation \(EC\) No 765/2006](#). The new regulation added 12 individuals and eight entities, who have been found to have taken part in violations of human rights and repression of civil society in Belarus by benefiting from the Lukashenka regime. For example, the amended list includes businessman Ivan Galavaty, Director-General of the Open Joint Stock Company "Belaruskali",

which is a major source of revenue and foreign currency for the Lukashenka regime, and which has been added to the list of legal persons.

Moreover, the amendment also extends to persons involved in political prosecutions and several persons working in the news industry, for benefitting from and supporting the Lukashenka regime. Entities that have been deemed a major source for revenue for the Lukashenka regime are also listed: Open Joint Stock Company “Belaruskali”, Open Joint Stock Company “Gordno Tobacco Factory Neman” and “Inter Tobacco” LLC.

De-SWIFTing of Russian and Belarusian banks

[Annex VIII of Council Decision \(CFSP\) 2022/884](#), amending [Decision 2014/512/CFSP](#), extends providing financial messaging services (SWIFT) to the listed Russian financial institutions. [Annex XIV of Council Regulation \(EU\) 883/2014](#) now includes three additional Russian credit institutions, namely Sberbank, Creditbank of Moscow and Joint Stock Company Russian Agricultural Bank, JSC Rosselkhozbank. Furthermore, [Council Regulation \(EU\) 2022/877](#) amends [Council Regulation \(EC\) No 765/2006](#) regarding a ban on providing Financial Messaging Services to Belarusian financial institutions. [Annex XV of Council Regulation \(EC\) No 765/2006](#) has been updated to include the Belarusian Bank For Development And Reconstruction (Belinvestbank).

Broadcasting bans

Bans have been imposed on three more Russian broadcasting outlets, namely RTR/RTR Planeta, Rossiya 24/ Russia 24 and TV Centre International (see [Annex VI Council Regulation \(EU\) 2022/879](#), amending [Annex IX Council Decision 2014/512/CFSP](#)). EU operators are prohibited to broadcast, or to enable, facilitate or otherwise contribute to broadcast, any content by the listed outlets, including through transmission or distribution by any means such as cable, satellite, IP-TV, internet service providers, internet video-sharing platforms or applications, whether new or pre-installed. Furthermore, EU individuals and entities are prohibited from advertising products or services in any content produced or broadcasted by these outlets.

Import bans on crude oil and petroleum products

[Council Regulation \(EU\) 2022/879](#) amends [Council Regulation \(EU\) No 833/2014](#) by inserting Article 3m. Article 3m prohibits the direct or indirect purchase, import or transfer of crude oil or petroleum products if they originate from Russia or are exported from Russia. The prohibition circumferences technical assistance, brokering services, financing or financial assistance or any other related services.

However, several exceptions apply regarding the phasing out of Russian crude oil and petroleum products. One-off transactions for near-term delivery of crude oil, concluded and executed before 5 December 2022 are exempted, as well as one-off transactions for near-term delivery of petroleum products, concluded and executed before 5 February

2023. Furthermore, the purchase, import or transfer of seaborne crude oil and petroleum products originating in third countries, which are only loaded in, departing from, or transiting through Russia, is not banned.

For now, the prohibition does not apply to crude oil falling under CN 2709 00 (Petroleum oils and oils obtained from bituminous minerals, crude, see [Annex XXV Council Regulation \(EU\) 2022/879](#)), which is **delivered by pipeline** from Russia into Member States, until the Council decides otherwise.

According to Article 3m (4), a landlocked Member State may obtain seaborne crude oil of the type CN 2709 00 from Russia by way of an exceptional temporary derogation if the Member State is depending on the supply by pipeline, and if the supply is interrupted by circumstances outside of the control of the Member States.

Export Restrictions

According to [Article 1 Council Regulation \(EU\) 2022/879](#) the list of goods and advanced technology in [Annex VII Council Regulation \(EU\) 833/2014](#) banned to be exported to Russia has been expanded. It is now prohibited to sell, supply, transfer, or export, directly or indirectly, various chemicals that could be used to produce chemical weapons. The list of entities to which the ban to sell, supply, transfer and export goods and technologies contributing to Russia's military and technological enhancement, has been expanded by a number of further Russian institutions and companies.

Moreover, the UK and South Korea have been added to the list of partner countries that have adopted similar export restrictions. Previously, the US and Japan have been named a such partner counties.

Ban on Consulting Services

Pursuant to [Article 5n of Council Regulation \(EU\) 2022/879](#) it is prohibited to provide consulting services such as accounting, auditing, bookkeeping or tax consulting services, business and management consulting or public relations services to the Government of Russia or legal persons, entities or bodies established in Russia. At the same time, this provision sets out a number of exceptions, which include services necessary for the termination by 5 July 2022 and services intended for the exclusive use of entities established in Russia that are owned by, or solely or jointly controlled by an EU entity.

We are at your disposal at any time to answer questions on the practical implementation as well as on the scope of application of these sanctions. Please do not hesitate to contact [Pascal Friton](#), [Roland M. Stein](#), [Florian Wolf](#), [Laura Louca](#) or [Tobias Ackermann](#).