

# Further Russia sanctions: listing of further persons, aviation and SWIFT de-coupling

28 February 2022

## Further persons have been listed

In the course of today, the EU has passed [Council Implementing Regulation \(EU\) 2022/336](#). According to this Regulation, the persons and entity listed in the Annex to the Regulation shall be added to the list set out in Annex I to [Regulation \(EU\) No 269/2014](#). The new list includes Gas Industry Insurance Company Sogaz and persons such as Igor Sechin (CEO of Rosneft), Nikolay Tokarev (CEO of Transneft), Mikhail Fridman (founder of Alfa Group), Alisher Usmanov, Petr Aven, Sergei Rodulgin, Gennady Timchenko (all of which have close ties to President Putin), Dmitry Peskov (press secretary of President Putin), further high ranking politicians, a number of journalists that have strongly supported the current aggression against Ukraine as well as some high ranking members of the military.

## Sanctions on Aviation

In the night from Sunday to Monday, the EU has broadened its sanctions concerning Russia's aviation sector due to the ongoing aggression towards Ukraine. This was preceded by the decision of various EU member states, including Germany, Bulgaria, Poland, the Czech Republic, Slovenia, and the Baltic States to ban Russian aircraft from their airspace. [Council Regulation \(EU\) 2022/334 of 28 February 2022](#) amends [Council Regulation \(EU\) No 833/2014](#). Article 3d (1) of the revised version of the latter states in its first paragraph that it shall be prohibited for any aircraft operated by Russian air carriers, any Russian registered aircraft or any non-Russian-registered aircraft controlled by Russian natural or legal persons, entities or bodies to land in, take off from or overfly the territory of the Union. This comprehensive prohibition is complemented by Article 12, which forbids to participate, knowingly and intentionally, in activities that have the purpose or effect of circumventing these prohibitions.

Expressly excluded from this restriction are cases of emergency landings and emergency overflights. In addition, competent authorities may provide for derogations from the prohibitions for humanitarian purposes or purposes consistent with the objectives of the regulation.

## **SWIFT de-coupling: not yet legally implemented**

In the course of the recent developments, the EU has also announced to (partially) exclude Russia from the SWIFT system. This measure, considered to be one of the toughest of Western economic sanctions, would restrict Russia's access to financial markets around the world and substantially hamper the EU-Russian trade. It should be noted, however, that the exclusion so far is a political announcement. Accordingly, the SWIFT exclusion has not yet been legally implemented or executed. It is therefore important to continue to monitor the situation closely.

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