

BULLETIN

22 December 2014

To all Members

Sanctions in respect of Crimea and Sevastopol in response to the annexation of Crimea and Sevastopol.

European Union Council Regulation (EU) No. 1351/2014 of 18 December 2014

In response to the annexation of Crimea and Sevastopol by Russia, the European Union published Regulation 692/2014 of 23 June 2014, introducing trade sanctions in respect of goods originating in Crimea or Sevastopol. On 30 July 2014 the European Union published Regulation 825/2014 amending Regulation 692/2014. These Regulations are referred to in the Association's Circulars of 17 July 2014 and 12 August 2014.

On 18 December 2014 the European Union published Regulation 1351/2014 again amending Regulation (EU) 692/2014. The most notable amendments add further to the prohibitions in Article 2 and these are outlined below.

Article 2b of the Regulation provides that it is prohibited:

- To sell, supply, transfer or export goods and technology as listed in Annex II to any natural or legal person, entity or body in Crimea or Sevastopol or for use in Crimea or Sevastopol.

This prohibition shall include certain goods and technologies suited for use in the following key sectors.

- Transport
- Telecommunications
- Energy
- The prospection, exploration and production of oil, gas and mineral resources

Article 2d provides that it shall be prohibited for any ship providing cruise services to enter into or call at any port situated in the Crimean Peninsula listed in Annex III. This prohibition applies to ships flying the flag of an EU Member State or any ship owned and under the operational control of an EU ship owner or any ship over which an EU operator assumes overall responsibility as regards to its operation.

Article 2e permits the competent authorities to grant an authorisation in relation to these prohibited activities, under such terms and conditions as they may deem appropriate.

Regulation 1351/2014 can be accessed using the following link :-

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2014.365.01.0046.01.ENG

United States Executive Order of 19 December 2014

President Obama signed an Executive Order on 19 December 2014 to take additional steps to address the Russian occupation of Crimea. By this order, amongst other things, the following are prohibited :

- The importation into the United States, directly or indirectly, of any goods, services or technology from the Crimea region of Ukraine.
- The exportation, reexportation, sale or supply, directly or indirectly, from the United States of any goods, services or technology to the Crimea region of Ukraine.

A copy of the Executive Order can be accessed using the following link :-

<http://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20141219.aspx>