



## •ALERT•

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# Green light for 11th sanctions package against Russia

The **Council of the European Union**, through EU Reg. 2023/1216 of June 23, 2023, **adopted the 11th package of sanctions against Russia**.

Among the main new features is the introduction of a new anti-circumvention tool aimed at restricting the export, to third countries that lend themselves to triangular transactions with Russia, of specific categories of goods and technologies that can contribute to the technological strengthening of Russia's defence and security field. At present, however, Annex XXXIII, which is supposed to list third countries at persistent and high risk of circumvention along with the goods whose export is prohibited, is empty. It will therefore need to be monitored for changes in order to operate safely and legally even when exporting to destinations other than Russia.

From the perspective of subjective restrictions, 87 subjects were added to Annex IV, including, but not limited to, three companies from Hong Kong, two from Uzbekistan, two from the United Arab Emirates and one from Syria.

With specific reference to export restrictions, EU Reg. 2023/1214 expanded the spectrum of products listed in Annex VII to include certain electronic components, optics, and navigational instruments; in Annex XXIII to include specific types of tires, textiles, chemicals, and plastics; and in Annex XXXV on arms.

Many luxury goods (recreational and sport ships, telescopes, etc.), previously covered by Annex XVIII, are now contained in Annex XXIII, and for them the export ban exists regardless of the value threshold.

It should also be noted that new categories of goods have been added to Annex XVII, concerning steel products originating in, or exported from, Russia, and Annex XXI, concerning goods generating significant revenue to Russia.



In terms of the measures taken at import, a new burden of proof has been introduced on those importing steel products listed and processed in third countries that, as of Sept. 30, are required to prove that the inputs used do not originate from Russia.

Specific bans then affect the transport sector, both land and sea, with the aim of preventing circumvention of bans on the import of Russian goods and oil into EU territory.

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