



# EU's 13th sanctions package against Russia



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## EU's 13th sanctions package against Russia

On 23 February 2024, EU adopted its 13th package of sanctions against Russia.

The sanctions package introduces more and stricter sanctions against Russia and its military and authorities and certain Russian individuals and enterprises. The sanctions package extends existing trade bans to include more products and technologies and to apply to more individuals, entities and bodies in Russia and third countries. Furthermore, the sanctions package adds further individuals, entities and bodies to the list of sanctioned parties (the asset freezing list).

The main new sanctions are mentioned below.

### Extension of the ban on exports of certain products, technologies and items

The sanctions package extends the ban on exports of certain products that may contribute to enhance Russia's industrial capacity. The ban now applies to more products which have been added to the list of products in Annex XXIII to EU Regulation 833/2014. As regards existing contracts concluded before 24 February 2024, the ban on exports of the relevant products is not to apply until 25 May 2024.

The ban on exports of certain products and technologies that contribute to Russia's military and technological enhancement or to the development of its defence and security sector is also extended. The ban now applies to more products and technologies which have been added to the list of products and technology in Annex VII to EU Regulation 833/2014. The package also expands the list of certain components for the development and

production of drones, such as electrical transformers, static converters and inductors found, among others, in drones as well as aluminium capacitors, which have applications such as in missiles, drones and communication systems for aircraft and vessels.

## Expansion of the list of individuals, entities and bodies which are military end-users etc.

The sanctions package expands the list of individuals, entities and bodies referred to in the bans on sale, supply, transfer and exports of dual-use products and technology as well as products and technologies which contribute to Russia's military and technological enhancement or to the development of Russia's defence and security sector.

The list includes individuals, entities or bodies which are military end-users or form part of Russia's military and industrial complex, or which have commercial or other links with, or which otherwise support, Russia's defence and security sector.

The expansion entails that further 17 Russian companies and 9 companies registered in Kazakhstan, China, India, Serbia, Thailand, Sri Lanka and Turkey are subject to these export restrictions.

## Expansion of the list of sanctioned parties (the asset freezing list)

The sanctions package expands the list of sanctioned parties (the asset freezing list) listed in Annex I to EU Regulation no. 269/2014. The expansion entails that further 106 individuals and 88 entities become subject to the rules on the freezing of funds and economic resources as well as the ban on making funds and economic resources available.

With the expansion, more than 2,000 individuals and entities are now on the list of sanctioned parties (the asset freezing list).

## Expansion of the list of partner countries

The sanctions package adds the United Kingdom to the list of partner countries listed in Annex XXXVI to EU Regulation 833/2014. The list includes partner countries that apply a set of restrictive measures on imports of iron and steel, which are substantially equivalent to those in the EU Regulation 833/2014.

The list of partner countries for the iron and steel imports now includes Switzerland, Norway and the United Kingdom.

## The sanction package's impact on Danish enterprises

Danish enterprises must comply with sanctions that apply to their business, activities and matters. A Danish enterprise which fails to comply with a provision or a ban concerning a sanction under Danish law, including EU

law, UN law or any other international law which applies under Danish law, may be penalised under the rules thereon. These are, among others, some of the rules of the Danish Criminal Code, including its section 110 c.

Danish enterprises should therefore examine and assess whether they comply with the sanctions rules. As a result of the more and more comprehensive sanctions against Russia under the 12th and 13th sanctions packages, Danish enterprises should ensure that their activities and transactions cannot be regarded as circumvention of the sanctions rules.

We advise enterprises on the sanctions rules and their compliance with them in relation to their performance of activities and transactions and related matters.

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