

FOLLOW-UP CIRCULAR 052/2022

30th June 2022

To: GCBx/CBs/GFs/ICs

Dear Colleagues,

Sixth EU sanctions package concerning Russia and Belarus – Follow up

You were informed, via Circular 052/2022 of 16th June 2022, on the restriction concerning the import of Russian listed crude oil and petroleum products into the European Union, as well as the provision of insurance and reinsurance of the transport of such goods.

The CoB Secretariat further enquired on the interpretation of this restriction and the will of the legislator in extending or not the prohibition to insurance and reinsurance related to the road transport of the goods which are subject to this prohibition.

In its [new and consolidated guidance](#) regarding the EU sanctions against Russia, the Commission has included this question (see question 14 below) in that guidance. The Commission's position is now that Article 3n applies only to maritime transport. This is made clear in its responses to questions 13 and 14 which read as follows:

13. Can an EU insurer continue to provide insurance to a vessel carrying Russian oil? (Last update: 22 June 2022)

*After a wind down period of 6 months, during which contracts signed before 4 June 2022 can still be executed until 5 December, EU operators will be prohibited from insuring and financing **the maritime transport** of goods set out in Annex XXV to third countries.*

14. Does the prohibition to provide technical assistance, financing and financial assistance set out in Article 3n apply to all modes of transport of oil to third states? (Last update: 22 June 2022)

*No, **it only applies to maritime transport** and does not extend to pipeline transport. This intention is clear from recital 15 of Council Regulation (EU) 2022/879 and the reference to the prohibition to insure transport including through ship-to-ship transfers in paragraph 1 of Article 3n.*

We hope this provides the necessary guidance in understanding the applicability of the sixth package of sanctions imposed on Russia and Belarus.

Sincerely yours,

Secretariat
