



REPUBLIC OF CYPRUS
SHIPPING DEPUTY MINISTRY

SIN. No.12/2022

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SANCTIONS INFORMATION NOTICE

To all Registered owners, Registered bareboat charterers
Managers and Representatives of Cyprus ships

To all Owners, Managers, Representatives and Agents in Cyprus of Ships, irrespective of flag they are flying, calling at Cyprus ports

Subject: Revised European Commission's FAQs on the transport of certain goods, including coal, from the Russian Federation to third countries and the provision of relevant services (financial assistance, brokering or insurance)

1 I refer to the above subject and further to SDM Circulars No.10/2014, No. 21/2014, No. 23/2014 and to Sanctions Information Notices (SINs) No. 15/2017, No.7/2018, No.1/2022, No.2/2022, No.4/2022, No.5/2022, No.7/2022, No.8/2022 & No. 11/2022, I wish to inform you that on 19 September 2022, the European Commission has issued **revised Frequently Asked Questions (FAQs)** on Articles 3g, 3i and 3j of Council Regulation (EU) No. 833/2014 as amended¹ ("the Regulation"). The revised FAQs, which you may opt to consult, are obtainable from below link:

https://finance.ec.europa.eu/system/files/2022-09/faqs-sanctions-russia-listed-goods_en.pdf

2 The above revised Frequently Asked Questions (Questions 2 and 4 of the FAQs in particular) clarify, *inter alia*, that:

The **transport to third countries of certain goods** listed in Annex XXI² and XXII³ of the Regulation **should be allowed** in light of the European Union's commitment to avoid that its sanctions **impact food and energy security of third countries** around the globe, in particular of the least developed ones.

This applies to the transport to third countries, as well as the provision of insurance, brokering services or other financing or financial assistance related

¹ The latest consolidation of this Regulation is obtainable from below link:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02014R0833-20220722&qid=1663656725487&from=EN>

² Annex XXI of the Regulation lists goods and technology as referred to in Article 3i.

³ Annex XXII of the Regulation lists coal and other products as referred to in Article 3j.



to such transport, carried out by EU operators or via the EU territory (including in transit) of the following goods:

- **Fertilisers** falling under CN codes 310420, 310520; 310560; ex31059020 and ex31059080 related, as listed in Annex XXI;
- **Animal feed** falling under CN code 2303, as listed in Annex XXI;
- **Certain hydrocarbons** falling under CN codes ex2901 and 2902, as listed in Annex XXI;
- Essential goods falling under CN codes 44 (**wood**); 2523 and 6810 (**cement products**), as listed in Annex XXI;
- All the items listed in Annex XXII (**coal and related products**).

3 A regularly updated list of all the European Union restrictive measures may be found on the website of the Official Journal of the European Union (<https://eur-lex.europa.eu/oj/direct-access.html>) and on the **EU Sanctions Map** (<https://www.sanctionsmap.eu/#/main>).

4 In addition, the “European Union Consolidated Financial Sanctions List”, regularly updated by DG FISMA⁴, may be found on below link <https://webgate.ec.europa.eu/europeaid/fsd/fsf/public/files/pdfFullSanctionsList/content?token=dG9rZW4tMjAxNw> .

Furthermore, European Union Consolidated Financial Sanctions List bears the following disclaimer:

While every effort is made to ensure that the database and the consolidated list correctly reproduce all relevant data of the officially adopted texts published in the Official Journal of the European Union, the Commission cannot accept any liability for possible omissions of relevant data or mistakes, and for any use made of the database or of the consolidated list. Only the information published in the Official Journal of the EU is deemed authentic.

5 Moreover, the “Commission Consolidated List of FAQs on the implementation of Council Regulation No 833/2014 and Council Regulation No 269/2014”, regularly updated by the European Commission may be found on below link: https://ec.europa.eu/info/sites/default/files/business_economy_euro/banking_and_finance/documents/faqs-sanctions-russia-consolidated_en.pdf (the latest update of the Consolidated FAQs does not yet incorporate the 19 September 2022 revised FAQs).

Furthermore, the Commission Consolidated List on FAQs bears the following notice:

This document is not a legal act. It is a working document drafted by the Commission services in order to help and give guidance to national authorities, EU operators and citizens for the implementation and the interpretation of Council Regulation No 833/2014 and Council Regulation No 269/2014. It has no binding effect.

6 In view of the gravity of the situation in Ukraine, it is stressed that, the relevant restrictive measures are subject to constant review by the European Union. In addition, the European Commission frequently revises the related part of the European Union Consolidated Financial Sanctions List and the Commission

⁴ Directorate-General for Financial Stability, Financial Services and Capital Markets Union.

Consolidated List of FAQs. Thus, it is advisable to regularly consult the aforementioned links.

7 Additional information in view of the gravity of the situation in Ukraine may be found on the **specialised link** created on the SDM website titled “Information in view of the gravity of the situation in Ukraine”:

<https://www.dms.gov.cy/dms/shipping.nsf/all/75954F9E737CE2DCC225880E00321DEB?opendocument>).

8 We wish to advise that, due to the complexity of the situation which is still evolving, when seeking interpretation of the provisions of the European Union restrictive measures, you should consider receiving expert legal advice. However, at the same time it is stressed that whether you acted having considered the legal advice you have received or you opted to consult the Commission Consolidated List on FAQs made available by the European Commission, compliance with the provisions of the European Union restrictive measures remains your responsibility.

9 All recipients of the present Sanctions Information Notice are invited to take note of its content and should strictly abide by the provisions of *the Implementation of the Provisions of the U.N. Security Council Resolutions or Decisions (Sanctions) and the E.U. Council Decisions and Regulations (Restrictive Measures) Law of 2016 (Law 58(I)/2016)*, as well as the EU Instruments implemented by virtue thereof, and SDM Sanctions Information Notices.



Liana Charalambous Tanos
Acting Permanent Secretary

- Cc:** - Attorney General of the Republic
- Permanent Secretary, Ministry of Foreign Affairs
 - Permanent Secretary, Ministry of Finance
 - Permanent Secretary, Ministry of Defence
 - Permanent secretary, Ministry of Energy, Commerce and Industry
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 - Cyprus Bar Association
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