

EU

Al-Qaida

[Council Regulation \(EC\) 881/2002](#), which imposes financial sanctions against Al-Qaida, has been amended, with the addition of individuals and legal entities to the consolidated list of asset-freeze targets.

Belarus

On 6 October, the Court of Justice of the European Union (CJEU) annulled the inclusion in the EU sanctions list of Yuri Chyzh and companies linked to him in the Triple Group, as well as the Belarus football club Dinamo Minsk. The Court held that there was insufficient evidence that Mr Chyzh financially supports the regime of President Alexander Lukashenko. ([Case T-275/12](#) and [Case T-276/12](#))

EU sanctions, which target individuals including President Lukashenko, look set to be suspended for four months following the recent release of political prisoners and the country's hosting of Ukraine peace discussions in February 2015.

Burundi

[Council Regulation \(EU\) No 2015/1755](#) imposes restrictive measures in view of the situation in Burundi. The Regulation makes provision for travel restrictions and the freezing of assets held by persons, entities or bodies deemed responsible for undermining democracy or obstructing a political solution in Burundi. An asset freeze now applies to the four individuals listed.

Iran

On 18 October 2015, the Parties to the Joint Comprehensive Plan of Action (JCPOA) welcomed the Adoption Day of Agreement related to the Iranian nuclear programme, where Iran will now start implementing all of its nuclear-related commitments. Meanwhile, the EU adopted the legislative framework to lift all of its nuclear-related economic and financial sanctions, which will take effect only on "Implementation Day". This implies that sanctions will not be lifted before that date. The EU legal acts can be accessed [here](#).

Liberia

Council Regulation (EC) No 872/2004 imposing financial sanctions against Liberia has been repealed pursuant to [Council Regulation \(EU\) 2015/1776](#). Consequently, as from the 6 October 2015, an asset freeze is no longer in force against the individuals listed.

Ukraine

Imposes Economic Sanctions Against Aggressors in Crimea.

On 16 September 2015, Ukrainian President Petro Poroshenko signed Decree No. 549/2015 issuing new economic sanctions targeting persons and entities supporting Russia's annexation of Crimea and aggressions in the Donbass region of Eastern Ukraine. The decree, which is effective for one year, applies sanctions against 388 individuals and more than 105 entities, the preponderance being from Russia. They include Russian airlines, media, banks (although not the prominent Russian banks with subsidiaries in Ukraine) and military organizations.

The sanctions do not target Russia's energy sector, on which Ukraine continues to rely heavily. Sanctions imposed against the listed individuals and entities include blocking of assets, travel and visa restrictions, and various financial transactions and banking restrictions.

EU Amends Restrictive Measures Against Russia to Exclude European Space Industry

[Council Decision \("CFSP"\) 2015/1764](#) amends the EU Russia sanctions to exclude certain operations relating to use of launchers operated by European launch service providers, or for the use of launches of European space programs, or for the fueling of satellites by European satellites manufacturers.

The amended restrictive measures against Russia allow the European space industry to conduct exports and other transactions involving rocket fuels and to provide launch services and related technical assistance that are otherwise prohibited under the regulations.

US

Cuba Sanctions Further Relaxed

Effective 21 September 2015, the Treasury Department's Office of Foreign Assets Control (OFAC) and the Commerce Department's Bureau of Industry and Security (BIS) made regulatory amendments allowing individuals and companies to further engage with Cuba. Of note, OFAC now authorizes certain categories of persons subject to US jurisdiction to establish a physical presence (e.g., an office) in Cuba to facilitate authorized transactions. Additionally, the BIS amended License Exception Support for the Cuban People (CSP) to authorize the export or reexport to Cuba of commodities or software that will be used by individuals or private sector entities to develop software that will improve the free flow of information or that will support certain private sector activities.

State Department and BIS Seek Comments on Certain USML Categories and Related Items on the CCL

Continuing its effort under the Export Control Reform (ECR) initiative, the US Department of State issued a Request for Comments concerning its 2014 revisions to the following categories of the United States Munitions List (USML): Category VI (Surface Vessels of War and Special Naval Equipment), Category VII (Ground Vehicles), Category XIII (Materials and Miscellaneous Articles) and Category XX (Submersible Vessels and Related Articles). Relatedly, BIS issued a Request for Comments concerning certain related items that were transferred from the USML to the Commerce Control List (CCL), including certain military vehicles, vessels of war, submersible vessels, oceanographic equipment, auxiliary and miscellaneous military equipment, and related items therefor. Comments for both requests are due by 8 December 2015.

Iran Nuclear Deal Update

As discussed in the EU section, Adoption Day of the JCPOA occurred on 18 October 2015. On Adoption Day, the US took a number of steps to prepare for the implementation of its JCPOA obligations, including the US State Department's issuance of [waivers](#) of certain statutory sanctions contingent on the JCPOA's Implementation Day. Further information on Adoption Day can be found [here](#) and [here](#).

Enforcement Actions

BIS Denial Orders

The BIS imposed a denial of export privileges against multiple parties for violations of the Export Administration Regulations (EAR). Between October 2010 and March 2013, the parties were engaged in a conspiracy to export and reexport web monitoring and controlling equipment and software to Syria without a required license. BIS had previously imposed penalties on other individuals and entities in related enforcement actions, including a US\$2.8 million penalty on Computerlinks FZCO in April 2013. See [denial orders](#).

About Our Team

Our export controls and sanctions team is built on the ability to advise on the shifting regulatory framework on both sides of the Atlantic. We have extensive experience in advising and representing a wide range of companies and financial intuitions in Europe, the US and other jurisdictions on export control and sanctions from a multijurisdictional perspective. Our export controls and sanctions team is part of our overall International Trade Practice, providing a “one-stop” solution to global trade compliance through rapid, professional and tailored advice and compliance tools to fit your business needs and processes. If you have any question relating to sanctions please contact a member of our EU or US sanctions team listed herein. You can also email InternationalTradeCompliance@squirepb.com for assistance.

Resources at Your Fingertips

- Our blog, [The Trade Practitioner \(www.tradepractitioner.com\)](http://www.tradepractitioner.com), offers current international trade events and compliance tools.
- Our complimentary ITAR Handbook includes not only International Traffic in Arms Regulations (ITAR) but also the US Department of Commerce “600 Series;” a summary of ITAR and Export Administration Regulations (EAR) exemptions; a primer for export controls compliance; key points of contacts for the US government, including phone numbers; and other useful materials. Download your copy of the Handbook [here](#).

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