

On 16 October 2025, the European Commission (EC) released two FAQs, tightening the lines of an already intricate standing framework. Read together, they clarify a regime in which dual-use goods and advanced-technology items are hemmed in by clear rules, narrow humanitarian and technical corridors, and increasing vigilance against circumvention attempts; and, alongside this, they clarify a trade in petroleum products under CN 2710 that must carry credible proof that the crude from which they were obtained was not Russian in origin.

Export-related Restrictions

On the export side, the guidance restates the architecture of Regulation 833/2014 as amended.¹ Articles 2 and 2a, with related provisions, extend the prohibitions beyond the act of export to the sale, supply, transfer and brokering of listed items, together with the provision of technical and financial assistance. Early in the text, a simplified decision tree leads the practitioner from product classification to the limited exemptions or the narrowly drawn derogations, and thence, where neither applies, to the hard stop of a prohibition.

Exemptions are few and crafted for public-interest needs. Humanitarian and health responses, and certain medical or pharmaceutical uses not listed in Annex XL, may be invoked, but only with a customs declaration and a notification of first use for each Russian recipient. Derogations, available only upon prior authorisation, are similarly bounded: cooperation in space programmes, civil nuclear operations, maritime safety, non-public electronic communications networks, exclusive use by entities controlled by the European Union (EU) or partner countries, diplomatic missions, cyber- and information-security functions, software updates, consumer communications devices, and specified medical and pharmaceutical items. None of this relief extends to end-users connected with Russia's defence-industrial base in Annex IV; there, only tightly circumscribed emergency grounds may be entertained, and anticircumvention duties reach affiliates and intermediaries.

Two clarifications have operational weight: firstly, remote interventions such as configuration updates, monitoring and log analysis may fall within the software-update carveout when the use and the end-user are nonmilitary, and the first use per recipient has been notified; and secondly, the route matters as much as the object – transit through Russia of dual-use goods and Annex VII advanced technologies exported from the EU is itself prohibited, with exemptions and derogations mirroring those that apply to export.

The guidance also fixes the contours of legacy transactions. Grandfathering is confined to contracts for which authorisation requests were lodged by 1 May 2022, and never where there are reasonable grounds to believe the end-user or end-use is military. EU general export authorisations EU003, EU004 and EU005 can no longer be relied upon for Russia-bound trade. There is no shipping clause; goods already en route do not enjoy a grace period. Because technology travels in minds as well as in crates, firms are reminded to control access to know-how where it would be used in Russia.

Enforcement attention, meanwhile, continues to converge on the EC's Common High Priority Items – a fifty-code roster that spans microelectronics, wireless components, connectors, bearings, optics, printed circuits, semiconductor manufacturing and test equipment, and Computer Numerical Control (CNC) machine tools. These are not illustrative lists for the bookshelf; they are practical markers of where due diligence procedures, contractual controls on reexport, and cooperation with partner countries must be most exacting.

Import Ban on Refined Products Obtained From Russian Crude Oil

The companion FAQs translate Article 3ma into operational due diligence for oil products.² The starting point is easy to state but difficult to prove – importers must be able to show that CN 2710 products brought into the EU were not obtained from Russian crude under CN 2709 00. Acceptable documentation ranges from refinery attestations to shipping records; mass-balance accounting is rejected. For refineries that run mixed slates, three scenarios are envisaged. Where flows are physically segregated, import is permitted if the product clearly derives from the non-Russian line. Where segregation is absent, import may proceed only if the refinery can demonstrate that no Russian crude was received or processed in the production line for at least sixty days before the bill of lading. Where neither assurance can be given, the import is barred. *De minimis* tank-heel residue does not convert an otherwise compliant product into a prohibited one.

¹ See [Export-related Restrictions for Dual-use Goods and Advanced Technologies](#)

² See [Import Ban on Refined Products Obtained From Russian Crude Oil](#)

There is relief proportionate to the trust placed in certain origins. Products imported from Annex LI partner countries, namely Canada, Norway, the US, the UK and Switzerland, require no crude-origin evidence. Separately, products of nonpreferential origin in jurisdictions that were net crude exporters in the previous calendar year benefit from a rebuttable presumption that domestic crude was used. The presumption eases paperwork yet does not immunise the trade; it can be displaced by significant evidence of disproportionate Russian crude receipts or of fraudulent relabelling. Hence the counsel to heighten vigilance for shipments from countries whose import profiles or blending practices raise questions, including Turkey, India and China.

The scope of Article 3ma is carefully delineated; it governs imports into the EU, not purchases for delivery to third countries. Emergency port calls and places of refuge are not frustrated by the rule; nor does it attach to bunker fuel used by a vessel to continue its voyage, or to fuel carried in an aircraft's tanks for the flight into the EU. Oils classified under CN 2707 fall outside its field altogether.

Taken together, these updates draw firms toward disciplined process and verifiable claims. Exporters of dual-use and Annex VII items must reclassify against Annex I and Annex VII parameters, screen rigorously against Annex IV and catch-all risks, redesign logistics to avoid Russian transit, invoke and log exemptions with precision, seek licences early where derogations are needed, and ring-fence intangible technology. Importers and traders of CN 2710 products must contract for non-Russian-crude warranties, preserve segregation or 60-day look-back evidence, refuse mass-balance attestations, use partner-country and net-exporter simplifications prudently, and align documentation with customs' inspection powers. The direction of travel is clear – fewer ambiguities, tighter documentation, and sharper attention to the paths by which goods and molecules enter the EU's market, so that compliance rests not on assertion but on proof.

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