



SANCTIONS LAB LIST

**NON-SANCTIONED TRADE THAT SUSTAINS RUSSIA'S
MILITARY-INDUSTRIAL COMPLEX**

Erlend Bjørtvedt,
Maksym Steblivskyi, Darya Kuzmina

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<https://statewatch.org.ua/en/>
sw@statewatch.org.ua

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BACKGROUND AND INTRODUCTION

This Document provides guidance to European and Norwegian policymakers on some of the most important goods and materials utilised in Russian wartime production, and identifies a number of items that are not sanctioned but still aid the Russian illegal war effort. Some technologies and materials remain outside the scope of EU sanctions despite their relevance to Russia's military-industrial complex. **The Sanctions Lab List** identifies specific gaps in the current sanctions regime that Norwegian producers and European regulators should be aware of.

The Document has been prepared by experts from two leading European sanctions research environments: the **StateWatch Think Tank** in Kyiv, including its project organisation **Trap Aggressor**; and the country risk and sanctions analysis company **Corisk AS** in Norway.

Together, we gathered direct industry expertise on supply chains of critical components and Russia's technological dependencies through a series of in-depth interviews with Ukrainian armament manufacturers. The respondents' answers may provide European and Norwegian authorities in export control and investigation with a basis for necessary regulatory foresight through a focus on the goods that are most critical to the course of the war in Ukraine.

The research also covers opportunities to deter Russia through further sectoral sanctions, based on Russian customs data. The resulting list consists of technologies and materials that have specifically avoided restrictive measures from European and Norwegian regulators. It also provides European and Norwegian manufacturers with further understanding of current and future risk factors in their own production lines, products and technologies. Not least, it will strengthen the ability for risk analysis, management and ethically based planning in the chemical and materials industries.

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1. COMMENTS FROM UKRAINIAN ARMAMENT MANUFACTURERS

Shaping sanctions policy requires detailed technical expertise, which is best provided by manufacturers of defence technologies. The objective of in-depth interviews is to systematise industry knowledge in order to assess the current state of Russia's technological base.

When asked to compare 2026 to previous years, interviewees identified the development of proprietary *satellite communication systems* as the area of the most notable Russian progress. This likely refers to expanded development of the Russian *Rassvet* low-orbit communications assets intended to reduce dependence on Western satellite infrastructure, such as *Starlink*, for military command and remotely piloted long-range UAV operations. Another important technology is the use of *mesh modems* to control individual UAVs, such as Shahed or Gerbera drones, on the battlefield.

The respondents also flagged other technology domains as concerning trends in Russian military-industrial development over the past year. These are *optical components and materials*, *small engines* for UAVs or cruise missiles, and *chemical precursors* for explosive manufacturing.

Additionally, the Ukrainian armament manufacturers identified three technology areas that are likely to determine battlefield advantage in UAVs in the near term. These are *jam-resistant long-range communications*, *automated day/night target recognition systems*, and next-generation *battery technology* with higher energy density and lower weight than current batteries. The interviewees linked each to specific critical components that are particularly difficult for Russia to produce locally – such as *microprocessors*, *thermal imaging matrices*, *magnets*, and *batteries* – noting that Russia obtains most of these components from China.

The observations made by the StateWatch sources are supported by statements from Russian military experts, officials, and company directors, published in Russian media or obtained by Ukrainian specialists.

In April 2026, a Ukrainian hacker joined a closed online meeting of Russia's Ministry of Industry and Trade (a.k.a. Minpromtorg) on UAV production. The meeting showed a critical dependency on Chinese components, with one of the participants stating that most Russian UAV parts come from China.¹ At the industry level, the director of the UAV competence centre at Bauman Moscow State Technical University identified *small servo drives* as the most critical component that needs to be replaced with Russian-made alternatives.²

A broader picture of localization progress comes from industry data published in February 2026. By the end of 2025, the average share of locally produced

¹ Украинский пранкер проник на созвон Минпромторга по дронам и выложил видео с оскорблениями в адрес российских чиновников. (2026). The Moscow Times. <https://ru.themoscowtimes.com/2026/04/20/ukrainskii-pranker-pronik-na-sozvon-minpromtorga-po-dronam-i-vilozhil-video-s-oskorbleniyami-v-adres-rossiiskih-chinovnikov-a193179>.

² Названы комплектующие наиболее остро нуждающиеся в импортозамещении. (2026). Дронофлот. <https://t.me/dronostroenie/1467>.

components in Russian UAVs stood at around 50–60%, up from around 40% in 2024. According to the data, over ten Russian companies are producing *electric UAV motors* from domestically sourced parts. *Flight controllers, speed regulators, and communication systems* are also being made by various Russian firms. However, serial production of *optics and servo mechanisms* remains unsolved and is limited to a few specialised defence enterprises. Finally, cost remains a persistent problem. Although some UAV components are produced in Russia, they are still more expensive than imported ones.³

These findings are consistent with earlier Russian industry statements. A 2024 source noted that *lithium-polymer batteries, servo mechanisms, and motors* were mostly of Chinese origin, with slow domestic substitution in propulsion systems.⁴ The director of Astron Aero LLC, which is part of the Rostec State Corporation, identified *lithium batteries and rare-earth permanent magnets for motors* as the two most import-dependent critical components.⁵

In conclusion, Russia has made real progress in UAV component localization since 2022, but remains deeply dependent on foreign supply chains for the most technically demanding parts – *batteries, rare-earth magnets, servo drives, optical systems, and electronics*. The majority of these technologies are already subject to EU sanctions and prohibited from direct export to Russia under Council Regulation (EU) No 833/2014. However, some of these items, such as batteries and electromagnets, represent strong candidates for inclusion in the Common High Priority Items List (CHPL) – a document developed through coordination between the US, the EU, the UK, and Japan, which designates the most critical technologies required for Russian weapons production. The supply of goods appearing on the CHPL constitutes grounds for secondary sanctions against entities registered in third-country jurisdictions.

2. NON-SANCTIONED GOODS AND SERVICES USED BY RUSSIA'S MILITARY-INDUSTRIAL COMPLEX

Despite over twenty rounds of sanctions, many product categories remain outside the EU's restrictive measures. The list of goods prohibited for export to Russia under Council Regulation (EU) No 833/2014 continues to grow: the 20th package, adopted in April 2026, added new export bans on industrial goods with both civilian and military applications, including *lubricant chemicals, rubber products, specific steel articles, metal production tools, and industrial tractors*. This shows that closing gaps in sanctions coverage remains an active policy task – and that analytical work to identify further candidates for listing continues to have practical relevance.

This analysis is mostly based on Russian customs data obtained through a commercial analytical platform. Using the information about exports of goods from Western countries to the Russian Federation, a screening of supplies of individual tariff

³ В России локализовано производство основных комплектующих для БПЛА. (2026). CNews. https://www.cnews.ru/news/top/2026-02-10_proizvodstvo_komplektuyushchih.

⁴ Российские беспилотники могут начать производить в странах Азии, Африки и Латинской Америки. (2024). BFM. <https://www.bfm.ru/news/557067>.

⁵ "Задачи будут решены" – О беспилотниках из первых рук. (2024). Редкие земли. <https://rareearth.ru/ru/news/20240914/04417.html>.

headings was carried out. A tariff heading corresponds to the first four digits of the commodity code under the World Customs Organization's Harmonized System (HS).⁶

The screening covered tariff headings included in HS sections V–VII and X–XX. For each tariff heading, total export values to the Russian Federation in 2021 and 2024 were collected, as well as the share of goods exported in 2024 that were produced in European countries and/or shipped directly from such countries to Russia. Based on the resulting values, individual tariff headings potentially linked to military use were identified. In particular, at least one of the following markers was considered:

- The volume of supplies of products under a given tariff heading in 2024 substantially exceeds the 2021 figures, which may indicate growing demand for the product in connection with the war against Ukraine;
- Russian importers of the products include enterprises directly linked to the Russian military-industrial complex or other sanctioned entities, which suggests possible military end-use of the goods.

Based on the analysis, proposals for sectoral sanctions were formulated regarding those tariff headings that meet at least one of the markers above and are still not covered by the current EU restrictions – namely, those that do not appear in the consolidated version of *Council Regulation (EU) No 833/2014* as of May 2026⁷ and are not present in the *correlation table for Part A of Annex VII*⁸ or in the *Dual use correlation table*,⁹ published on the official websites of the European Commission.

The analysis identified a number of goods for which sectoral sanctions are recommended. In the absence of formal sanctions on these goods, European and Norwegian producers should pay close attention to them and closely monitor their sales.

HS 2818.20 – Aluminium oxide

Although exports of pure aluminium and aluminium hydroxide from the EU to Russia are prohibited (HS 2818.30 and the entirety of Chapter 76 are covered under Annex XXIII of Council Regulation (EU) No 833/2014) – exports of aluminium oxide (alumina) are still allowed.

⁶ *HS Nomenclature 2022 Edition*. (2022). World Customs Organization.

<https://www.wcoomd.org/en/topics/nomenclature/instrument-and-tools/hs-nomenclature-2022-edition/hs-nomenclature-2022-edition.aspx>.

⁷ Council of the European Union. (2026). *Consolidated text: Council Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine (version as of 17 July 2026)*. EUR-Lex. <https://eur-lex.europa.eu/eli/reg/2014/833/2026-07-17>.

⁸ Directorate-General for Financial Stability, Financial Services and Capital Markets Union. (2025). *Export-related restrictions on dual-use goods and advanced technologies (correlation table included)*. https://finance.ec.europa.eu/publications/export-related-restrictions-dual-use-goods-and-advanced-technologies_en.

⁹ *TARIC and Quota data and information. 2026 - Dual use correlation table 1 January 2026.xlsx*. (2026). CIRCABC. <https://circabc.europa.eu/ui/group/0e5f18c2-4b2f-42e9-aed4-dfe50ae1263b/library/c3d06bd7-6ef0-4771-bbd7-f92b976ae9a0>.

Alumina is the refined powder produced from bauxite that serves as the main raw material for aluminium smelting. Without alumina, no aluminium can be produced. After the start of the full-scale invasion, the **Aughinish Alumina plant** located in Ireland, as well as other facilities, increased exports of alumina to Russian metallurgical enterprises (Diagram 1). As a result, more than USD 420 million worth of alumina was exported directly from Europe to the Russian Federation in 2024.

According to an OCCRP investigation, after arriving in Russia, alumina is processed into aluminium and sold to customers, in particular **Aluminievaya Sbytovaya Kompaniya LLC**, which supplies aluminium to sanctioned Russian weapons manufacturers.¹⁰ Despite appeals from journalists and Members of the European Parliament, the EU has still not imposed additional restrictions on the export of alumina to Russia in its 20th sanctions package.¹¹

Norway is both a producer and importer of alumina, as part of the aluminium production process, producing in modest quantities.¹² No alumina has been exported from Norway to Russia over the last ten years.

Sanctions status: Aluminium oxide is listed in the Dual use correlation table¹³ published on the official website of the European Commission. However, this has not prevented it from reaching the Russian Federation.

¹⁰ Moskowitz, E., Gagarin, M., Gercama, I., & Gallagher, C. (2026). *Inside the Supply Chain Funneling Irish Alumina to Russian Rockets*. OCCRP. <https://www.occrp.org/en/investigation/inside-the-aluminum-supply-chain-linking-irish-industry-to-russian-rockets>.

¹¹ Shenawy, M., & Gercama, I. (2026). *Pressure Mounts in European Parliament to Curb Alumina Exports to Russia*. OCCRP. <https://www.occrp.org/en/news/european-lawmakers-alumina-russian-arms>.

¹² Kristiansen, L.-M., & Van der Eijk, C. (2020). *Overview of the Norwegian metallurgical industry: Part 1: Companies and production*. Norwegian University of Science and Technology (NTNU). [https://www.ntnu.edu/documents/1263635097/1279861738/Student%20report%202020%20Part%201%20Companies%20and%20Production%20\(1\).pdf](https://www.ntnu.edu/documents/1263635097/1279861738/Student%20report%202020%20Part%201%20Companies%20and%20Production%20(1).pdf).

¹³ *TARIC and Quota data and information. 2026 - Dual use correlation table 1 January 2026.xlsx*. (2026). CIRCABC. <https://circabc.europa.eu/ui/group/0e5f18c2-4b2f-42e9-aed4-dfe50ae1263b/library/c3d06bd7-6ef0-4771-bbd7-f92b976ae9a0>.

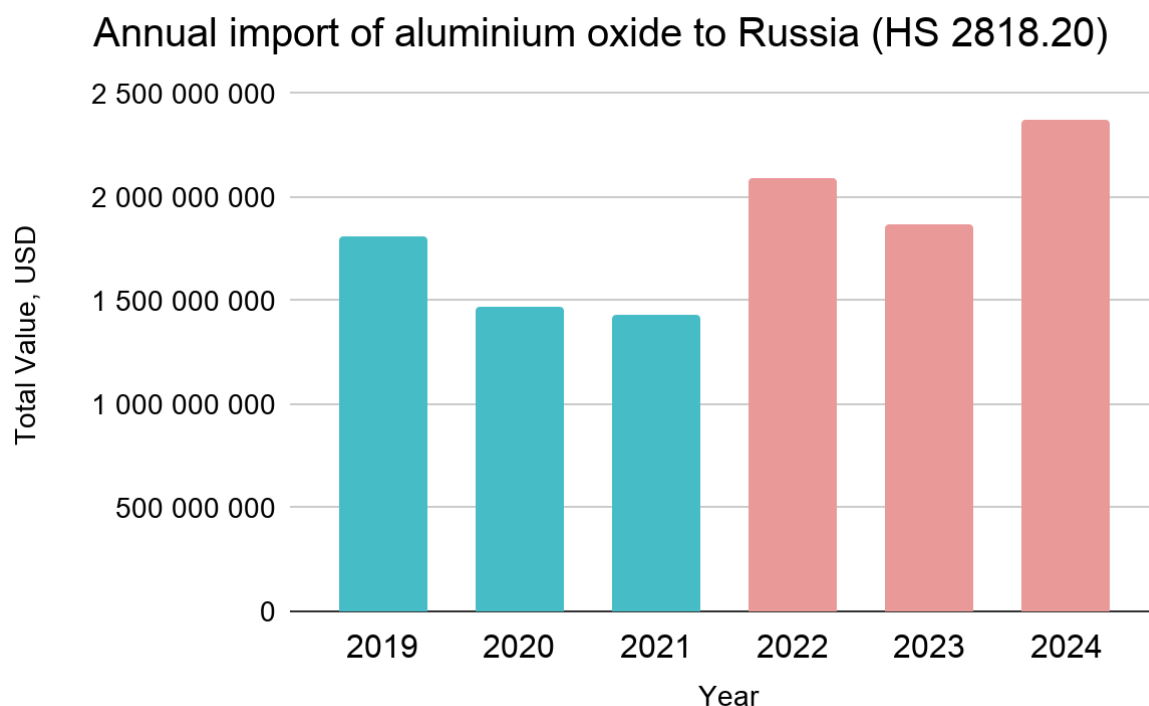


Diagram 1. Annual import of aluminium oxide under HS code 2818.20 to the Russian Federation in 2019–2024. Source: Russian import data

HS 7401.00 – Copper matte; Precipitated copper

Exports of any copper articles from the EU into Russia are prohibited, with the sole exception of copper matte (HS code 7401.00). The Nornickel Harjavalta plant in Finland, owned by the Russian mining and metallurgical company Norilsk Nickel, ships copper to Russia. As a result, copper matte worth more than USD 159 million was exported directly from European countries to the Russian Federation in 2024.

Copper is produced as a by-product of processing nickel ore supplied from Russia to Finland.¹⁴ Although demand for copper has risen during Russia's war in Ukraine, and copper is one of the key materials used in the defence and aerospace industries, the EU has not yet imposed sanctions on the export of copper matte to the Russian Federation.¹⁵ In April 2026, as part of the EU's 20th sanctions package, restrictions were introduced concerning the port of Murmansk, to which most copper shipments from the Finnish plant were directed. However, according to Nornickel Harjavalta CEO Joni Hautojärvi, the company is already exploring the possibility of using other Russian ports for exports.¹⁶

¹⁴ *Sanctions gap lets Russian-mined nickel flow to Western markets.* (2025). Global Witness. <https://globalwitness.org/en/campaigns/transition-minerals/sanctions-gap-lets-russian-mined-nickel-flow-to-western-markets/>.

¹⁵ *Завод в Финляндии перерабатывает российский никель и выпускает медь для военной промышленности – вот что об этом говорит генеральный директор.* (2024). Yle. <https://yle.fi/a/74-20080294>.

¹⁶ *Финский завод "Норникеля" прекратил отгрузку меди в Россию из-за санкций ЕС.* (2026). Деловой Петербург. <https://www.dp.ru/a/2026/05/13/finskij-zavod-nornikelja>.

Companies in Norway produced copper until recently, and new exploration efforts are underway to resume copper mining, including in the Nussir Formation in Finnmark county, Northern Norway.¹⁷ No copper matte has been exported to Russia over the last ten years.

Sanctions status: No restrictions identified for 7401.00. Exports of the entirety of Category 74 from the EU to the Russian Federation are prohibited under Annex XXIII of Council Regulation (EU) No 833/2014, except for copper matte (7401.00.00).

HS 7901 – Unwrought zinc

In 2022–2024, Russia expanded its zinc imports (Diagram 2). In 2022, Russia was a net importer of zinc, meaning more of the product was brought into the country than was shipped out.¹⁸ Zinc is used in the metallurgical industry to galvanise steel and protect it from corrosion.¹⁹ ²⁰ In 2024, unwrought zinc with a total value of more than USD 4.8 million was exported directly from European countries to the Russian Federation.

Of this, 44% went to LDM LLC – a Russian supplier of industrial equipment. Among the company's listed counterparties on its website are the sanctioned companies Severstal PJSC and Magnitogorsk Iron and Steel Works PJSC (a.k.a. MMK PJSC), which, according to investigations, supply steel for the production of Russian weapons, including Kalashnikov assault rifles and Kalibr cruise missiles.²¹

More than 20% of European unwrought zinc was also received by the Russian company GTS Group LLC (under US sanctions), which is engaged in the production and supply of industrial equipment, automatic control systems and electrical equipment.²² On the company's website, the sanctioned Severstal PJSC and MMK PJSC are likewise listed among its counterparties.²³

Norway does produce zinc at the smelting plant in Odda, owned by Swedish mining company Boliden, with production set to increase from 200,000 to 350,000 tons.²⁴

¹⁷ Nussir – Fremtidens mineraler fra Finnmark. (n.d.). Nussir ASA. <https://www.nussir.no/>.

¹⁸ Экспорт и импорт цинка в России в 2022 г. (2023). BusinessStat. https://businessstat.ru/images/demo/zinc_russia_imp-exp_demo_businessstat.pdf.

¹⁹ Egorov, K. (2023). Why Did Russian Economy not Collapse under Sanctions: Pre-War Evidence. Leibniz Institute for Financial Research SAFE (Sustainable Architecture for Finance in Europe). Policy Letter No. 102. https://safe-frankfurt.de/fileadmin/user_upload/editor_common/Policy_Center/SAFE_Policy_Letter_102.pdf.

²⁰ Devitt, P., & Desai, P. (2024). Russian firms raise zinc output to meet government demand, sources say. Reuters. <https://www.reuters.com/markets/europe/russian-firms-raise-zinc-output-meet-government-demand-sources-say-2024-07-03/>.

²¹ Schramade, K. (2023). Investigation: Italian company makes sure Russian war machine has the steel it needs. Kyiv Independent. <https://kyivindependent.com/investigation-italian-company-makes-sure-russian-war-machine-has-the-steel-it-needs/>.

²² On Second Anniversary of Russia's Further Invasion of Ukraine and Following the Death of Aleksey Navalny, Treasury Sanctions Hundreds of Targets in Russia and Globally. (2024). U.S. Department of the Treasury. <https://home.treasury.gov/news/press-releases/jy2117>.

²³ GTS Group. (n.d.). GTS Group. <https://gtsgrup.ru/>.

²⁴ Kleiven, D. G. S. (2025). Har investert milliarder i grønn sinkproduksjon. Boliden har investert milliarder i å modernisere Norges eneste sinkverk. Nå er Green Zinc Odda offisielt åpnet. NRK.no.

The refinery relies on ore imports from Ireland, but promising deposits are being explored within Norway.²⁵ In the period 2019-2021, companies in Norway exported zinc products to Russia, including rods and profiles, plates, bands or foils.²⁶

Sanctions status: No restrictions identified for 7901. Unwrought zinc does not appear in Annex VII, Annex XVIII, Annex XXIII, or other annexes of the consolidated version of Council Regulation (EU) No 833/2014, nor in the Dual-use correlation table.

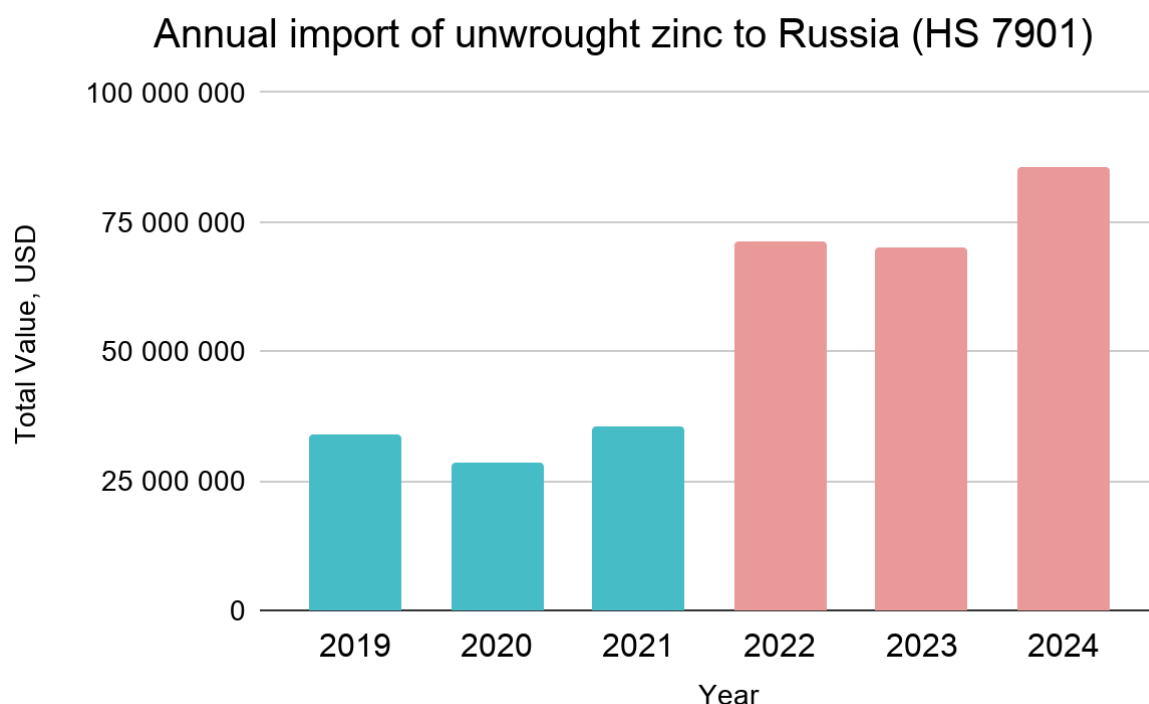


Diagram 2. Annual import of unwrought zinc under HS code 7901 to the Russian Federation in 2019–2024. Source: Russian import data

HS 8452.29 – Industrial-type sewing machines

In 2022 and 2023, imports of industrial-type sewing machines into the Russian Federation increased compared with 2021. Although household sewing machines worth more than EUR 750 (HS code 8452.10.00) are included on EU sanctions lists under Annex XVIII of Council Regulation (EU) No 833/2014, industrial equipment is not covered by the restrictions.

Meanwhile, in 2024, industrial-type sewing machines under HS code 8452.29 with a total value of more than USD 4.7 million were exported directly from European countries to the Russian Federation. Of these, about 70% of the equipment was

https://www.nrk.no/vestland/boliden-odda-utvider_-verdens-mest-klimaeffektive-sinkverk-er-apnet-1.17314878.

²⁵ Norwegian Ministry of Trade, Industry and Fisheries. (2023). *Norwegian Mineral Strategy*. Government.no. <https://www.regjeringen.no/en/documents/norges-mineralstrategi/id2986278/>.

²⁶ 08801: *Utenrikshandel med varer, etter varenummer (HS) og land 1988–2025*. (2026). Statistics Norway. <https://www.ssb.no/statbank/table/08801>.

purchased by enterprises of the Transmetall LLC group of companies.²⁷ In December 2021, Transmetall supplied sewing machines to DKBA JSC, a Rostec state corporation enterprise that produces aerostats for radar reconnaissance and supplies tents used in the war against Ukraine to protect personnel and equipment from rain and wind.^{28 29} In addition, court documents dated April 2026 reveal that Transmetall supplies fabric cutting and spreading complexes to Oktava JSC, another Rostec enterprise that, among other things, manufactures military body armour for units of the Russian armed forces.³⁰

In Norway, no companies produce industrial sewing machines, although there are several textile machinery distributors. Domestic production is limited to digital jacquard looms.³¹ However, Norwegian companies exported industrial sewing machines to Russia both in 2019 and 2020.³²

Sanctions status: No restrictions identified for 8452.29. Industrial sewing machines do not appear in Annex XVIII, Annex XXIII, Annex VII of the consolidated version of Council Regulation (EU) No 833/2014, nor in the Dual-use correlation table.

HS 7019.66, HS 7019.90 – Fabrics and other articles of glass fibres

Imports of glass fibres and articles thereof into the Russian Federation in 2022–2024 were consistently higher than in 2019–2021 (Diagram 3). In 2024, glass fibre products with a total value of more than USD 2.8 million were exported directly from European countries to the Russian Federation.

Of this, 44% went to the Russian supplier of high-tech equipment Legion Komplekt LLC³³, in particular under codes 7019.66.00 and 7019.90.00. According to the commodity descriptions, the imported glass fibre was used *"in the construction and repair of radio-controlled models, ships, and motorised gliders"*. In August 2024, the company came under US sanctions for supplying components for the production of Orlan UAVs used by Russian forces in Ukraine.³⁴

²⁷ О компании. (n.d.). Трансметалл. <https://www.transmetall.ru/about/detail>.

²⁸ Разработчик заявил о планах использовать аэростаты для радиолокационной разведки. (2024). ТАСС. <https://tass.ru/armiya-i-opk/21598727>.

²⁹ АО "ДКБА" передаёт метеотенты для использования в зоне СВО. (2023). АО "ДКБА". <https://www.dkba.ru/news/ao-dkba-peredajot-meteotenty-dlya-ispolzovaniya-v-zone-svo>.

³⁰ Ростех разработал новую версию штурмового бронжилета "Оберег-2.0". (2026). ГК "Ростех". <https://rostec.ru/media/news/rostezh-razrabotal-novuyu-versiyu-shturmovogo-bronezhileta-obereg-2-0/>.

³¹ Jacquard Loom Manufacturers | TC2 Loom. (n.d.). Digital Weaving Norway. <https://digitalweaving.no/>.

³² 08801: Utenrikshandel med varer, etter varenummer (HS) og land 1988–2025. (2026). Statistics Norway. <https://www.ssb.no/statbank/table/08801>.

³³ О компании. (n.d.). ООО "Легион Комплект". <https://legion-komplekt.ru/company/>.

³⁴ New measures to degrade Russia's wartime economy. (2024). U.S. Department of State. <https://2021-2025.state.gov/new-measures-to-degrade-russias-wartime-economy/>.

Norway has 36 companies and facilities producing glass fibres as of 2026, several of which manufacture advanced quality products.³⁵ Between 2019 and 2021, Norwegian companies exported glass fibre mats, plates, sheets, and yarns to Russia.³⁶

Sanctions status: No restrictions identified for 7019.66.00 and 7019.90.00. Within tariff heading 7019, some codes are already under EU sanctions: 7019.12.00, 7019.13.00, 7019.19.00 (Annex VII, Part A of Council Regulation (EU) No 833/2014). A number of glass-fibre products are also recorded in the Dual use correlation table.

Annual import of fabrics and other articles of glass fibres to Russia (HS 7019.66, HS 7019.90)

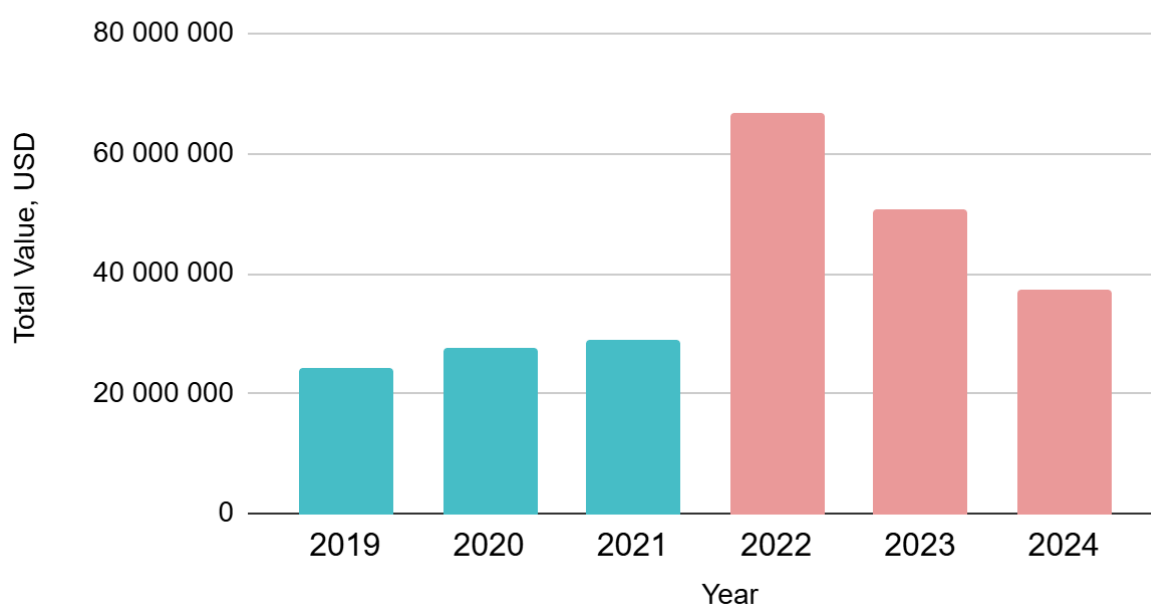


Diagram 3. Aggregated annual import of fabrics and other articles of glass fibres under HS codes 7019.66.00 and 7019.90.00 to the Russian Federation in 2019–2024. Source: Russian import data

HS 8451.80.80 – Machinery for coating or impregnating textile articles

Among the products in heading 8451, the following are already under EU restrictions: machines for washing, cleaning, wringing, drying, ironing, pressing, applying coatings, and other equipment (HS codes 8451.10, 8451.29, 8451.30, 8451.90 in Annex XXIII; 8451.80.30 in Annex VII, Part A; 8451.21.00 in Annex XVIII of Council Regulation (EU) No 833/2014).

In 2024, the Russian company BTK Tekstil LLC imported Unitech-brand drying machines from Italy into Russia, with a total value of USD 2.6 million. HS code 8451.80.80 was used for the supply.

³⁵ Glassfiberproduksjon – 36 selskaper i Norge. (n.d.). Proff.no.
<https://www.proff.no/bransjes%C3%B8k?q=Glassfiberproduksjon>.

³⁶ 08801: Utenrikshandel med varer, etter varenummer (HS) og land 1988–2025. (2026). Statistics Norway. <https://www.ssb.no/statbank/table/08801>.

BTK Tekstil belongs to the BTK Group, a group of companies that manufactures military uniforms for the armed forces, Rosgvardia, and other security agencies of the Russian Federation.

Norway has no production of this kind of machinery, but several distributors sell foreign models.

Sanctions status: No restrictions identified for 8451.80.80. Several other codes within heading 8451 are already under EU sanctions: 8451.10, 8451.29, 8451.30, and 8451.90 (Annex XXIII of Council Regulation (EU) No 833/2014); 8451.80.30 (Annex VII, Part A); and 8451.21.00 (Annex XVIII).

SERVICES – Maritime services to Russia

After the full-scale invasion, the EU enacted a ban on Russian trucks and vessels entering Europe. Transport of the aggressor's oil and related services was allowed if sold to end-users below a price cap. However, many other maritime services are allowed. These include the shipment of Russian liquified natural gas (LNG); the shipment of Russian metals, ores and many raw materials; the shipment of fish and many other consumer goods; providing ship management services for Russian customers; crew recruitment in Russia; and port services and supplies.

These services strengthen the Russian illegal war as they facilitate Russian export revenues and tax revenues by increasing the tonnage available for transporting valuable goods. The services also clearly endanger the security of Europe.

Some EU member states have resisted several proposed restrictions on maritime services, last time in July 2026, when Greece vetoed a ban on LNG transport services.

Norway is today the leading European provider of several maritime services to Russian fisheries and shipping. In some areas, Norway is the only provider of the services.

1. In Europe, only Norway provides Russian fishery vessels **port access**, which was banned by the EU from 16 April 2022.³⁷ The EU also banned the provision of port **services** and **supply** to Russian vessels. In Norway, three ports were cleared from October 2022 and are still accessible to Russian fishing vessels.³⁸ This gives Norwegian agents a near monopoly in selling port services and ship supplies to Russian vessels in Europe, which frees up available Russian supplies for other uses, including military. Russian customs data reveal that the ports of Kirkenes and Båtsfjord have served Russian shipping with many kinds of supplies during

³⁷ The Council of the European Union. (2022). *EU adopts fifth round of sanctions against Russia over its military aggression against Ukraine*. consilium.europa.eu.

<https://www.consilium.europa.eu/en/press/press-releases/2022/04/08/eu-adopts-fifth-round-of-sanctions-against-russia-over-its-military-aggression-against-ukraine/>.

³⁸ Norwegian Government. (2022). *Tighter restrictions on Russian fishing vessels enter into force*. Government.no. <https://www.regjeringen.no/en/whats-new/innstramming-for-russiske-fiskefartoy-trer-i-kraft/id2934462/>.

2024 and into 2025.³⁹ The full extent of Norway's services rendered to the LNG tanker fleet serving Russian gas exports via the Yamal facility is as yet unknown.

2. Russian access to Norwegian ports has been the direct and critical enabler of zero-tariff **Russian exports** of white fish (mainly cod) to the EU via Norwegian fish traders. It risks violating the EU tariff regime by sidestepping the liable 13% tariff on white Russian fish exported to the union.⁴⁰ This yields an extra 13% operational profits to Russian trawling companies. With a 25% corporate income tax rate, and Russian landings of NOK 1.8 – 2.0 billion per year, total fishery revenues since 2022 have reached a total of around USD 1 billion – facilitating windfall earnings of *an extra* USD 130 million, of which at least USD 30 million enter the Russian state budgets and help fund Russia's illegal war.^{41 42 43} In June 2026, the EU Commission proposed a complete ban on importing Russian cod (which at the time arrived almost exclusively via Norwegian or Chinese re-exports).⁴⁴
3. The Norwegian company *Silver Sea* **transports** Russian fish and seafood to ports in the EU.⁴⁵ The company facilitates substantial profit-yielding exports, which bring tax revenues to the Russian state. The company operates the ship *Silver Dana*, which in January 2025 was detained by police after suspicion of having cut a cable in the Baltic Sea.⁴⁶ This illustrates how engagement in shipping services, and especially crew recruitment involving Russia, represents clear security threats to Europe.
4. The Norwegian company *Havila*, including *HAV Ship Management*, provides ship **management** services that have been suspected of being tied to Russian interests.⁴⁷ The fleet is managed for unknown ultimate owners under flags of convenience.⁴⁸ Russian crews are recruited via *Hav Ship Management NorRus* in

³⁹ At the time of writing, Russian Customs data are only available until and including March, 2025.

⁴⁰ Hage, Ø. (2024). *Russisk torsk hvitvaskes i Norge før den selges tollfritt til EU*. Fiskeribladet. <https://www.fiskeribladet.no/okonomi/russisk-torsk-hvitvaskes-i-norge-for-den-selges-tollfritt-til-eu/2-1-1645419>.

⁴¹ Nilsen, T. (2023). *Russian vessels landed fish worth €175 million in 2022*. The Barents Observer. <https://www.thebarentsobserver.com/life-and-public/russian-vessels-landed-fish-worth-175-million-in-2022/151231>.

⁴² Hage, Ø. (2024). *Russisk torsk hvitvaskes i Norge før den selges tollfritt til EU*. Fiskeribladet. <https://www.fiskeribladet.no/okonomi/russisk-torsk-hvitvaskes-i-norge-for-den-selges-tollfritt-til-eu/2-1-1645419>.

⁴³ Based on legal tax rates, assuming all Russian fish being re-exported to the EU (likely), and assuming that all Russian fish being sold at market prices (likely). Observe that the 25% corporate income tax is only part of the tax revenue flowing to the Russian Federation from this business – the higher turnover will also provide a basis for higher revenues from personal income tax and payroll tax.

⁴⁴ Chase, C. (2026). *EU proposing complete ban on Russian cod, restrictions on other species*. SeafoodSource. <https://www.seafoodsource.com/news/supply-trade/eu-proposing-complete-ban-on-russian-cod-restrictions-on-other-species>.

⁴⁵ Staalesen, A. (2025). *In Murmansk Port works a fleet of Norwegian reefer vessels*. The Barents Observer. <https://www.thebarentsobserver.com/news/in-murmansk-port-works-a-fleet-of-norwegian-reefer-vessels/424940>.

⁴⁶ Staalesen, A. (2025). *Ship suspected of sabotage is detained by Norwegian Coast Guard*. The Barents Observer. <https://www.thebarentsobserver.com/news/ship-suspected-of-sabotage-is-detained-by-norwegian-coast-guard/423992>.

⁴⁷ Ship Management. (n.d.). HAV. <https://hav.no/ship-management/>.

⁴⁸ *Norwegian shipping company chair states Russian crew not involved in drone activities*. (2025). <https://www.bairdmaritime.com/shipping/dry-cargo/bulkers/letters-norwegian-shipping-company-chair-states-russian-crew-not-involved-in-drone-activities>.

Kaliningrad.^{49 50} The HAV fleet is regularly serving cargo shipping to or from Russia, key staples are steel and grain. The ships are regularly repaired and maintained at the *Pregol Shipyard* in Kaliningrad, and Hav Ship Management brings vessel parts like propellers, etc., from Europe to that yard. This has occurred at least since 2015, bringing crucial revenues and critical parts to the Russian shipyard.^{51 52} As late as March 2025, *Dolphin* was repaired at Pregol.⁵³ In February 2025, the ship *Germanica* was repaired.⁵⁴ The ships *Baltica*, *Tuna* and *Celtica* were all repaired in October 2024.

5. There are widespread Russian **imports** and foreign **repairs** of fishing vessels, but these are generally not provided by European companies.⁵⁵ According to Statistics Norway, exports of fishing vessels have not been declared after 2022. The Norwegian ban against repair and maintenance was announced on 12 May 2023, with wind-down procedures so that the last shipyard could complete works.⁵⁶ After May 2023, Russia declared imports of several fishing vessels from Norway or the North Atlantic, many of them after repair works. However, most of the repairs appear to have taken place at shipyards in Korea, which is also a member of the G7+ sanctioning alliance.⁵⁷

Maritime services: Security concerns

After 2024, the EU has increased the pressure on Norway to stop servicing Russian shipping. In 2025, after strong security concerns from the Netherlands,⁵⁸ the EU

⁴⁹ О компании HAV Ship Management, Ltd – Крюинговые компании. (n.d.). Korabel.ru.

https://www.korabel.ru/catalogue/company/hav_ship_management_norrus_as/o_kompanii.html.

⁵⁰ HAV Ship Management NorRus Russia Kaliningrad | Crewing Company | Maritime Employer. (n.d.). Crewell. <https://crewell.net/ru/companies/267819/>.

⁵¹ Norwegian shipping company chair states Russian crew not involved in drone activities. (2025).

<https://www.bairdmaritime.com/shipping/dry-cargo/bulkers/letters-norwegian-shipping-company-chair-states-russian-crew-not-involved-in-drone-activities>.

⁵² PSA PREGOL LLC. (n.d.). Enex. https://enex.market/en/visitors/ooo_srp_pregol/.

⁵³ Russian Customs data, stating declared imports at 5 February 2025. Ship listed as M/V HAV DOLPHIN, IMO 9073854.

⁵⁴ Russian Customs data, stating declared imports at 5 February 2025. Ship listed as M/V GERMANICA HAV, IMO 8324672.

⁵⁵ The EU ban on exporting vessels over the value of 50,000 euros except fishing vessels, entered into force on 17 March, 2022.

⁵⁶ Martin Markussen, H. (2023) *Får fortsette - Inntil videre*. Skipsrevyen. <https://www.skipsrevyen.no/kimek/far-fortsette-inntil-videre/1527790>.

⁵⁷ Fishing vessels that had been originally built in Norway and were declared as imported to Russia from or near the Barents Sea or the Norwegian Sea after May 2023, included: AK-0804 Darya, AK-0925 Sapphire II, BK-8060 Alsey, M-0258 Vladimir Zagoskin, M-0349 Kapitan Dolgikh, M-0350 Melkart-3, M-0412 Karelia II, M-0418 Melkart-2, MK-0215 Severyanin II, MK-0240 Sevryba-1, MK-0356 Rybak (aka Fisher), MK-0357 Vitus Bering, MK-0361 Vasilii Golovnin, MK-0362 Forpost, MK-0547 Saami-1, MK-0549 Kapitan Gerashenko, MK-0588 Melkart-5, MK-0599 Spitsbergen, MK-0641 Nord Tral, MK-0644 Baarentsburg, MK-0648 Azimut, MK-0652 Arktur, MK-0659 Neptune, MK-6613 Kapitan Bulatov, MK-7170 Melkart-7, MK-7710 Kanin Nos, MK-8724 Cefei (aka Cephey, Cepheus), PK-2094 Taurus (IMO 9281035), RS Moneron Island (IMO 8716887), S-0177 Azurit, Avacha (IMO 8918643), STR Arctic, SRTM Yumir (IMO 8709822), STR Champion, STR Torland (IMO 9217864), STR Toron (IMO 9217852), Atlant (IMO 9205201), Jupiter (IMO 7712937), Tanvas (IMO 9083005), Tenor (IMO 8709846), VK-0748 Olafsson (IMO 7704708).

⁵⁸ Chase, C. (2024). *Netherlands refuses access to Russian fishing vessels after espionage accusation*. SeafoodSource. <https://www.seafoodsource.com/news/supply-trade/netherlands-refusing-access-to-russian-fishing-vessels-after-espionage-accusation>.

eventually forced Norway to place sanctions on the two largest trawling companies – *Norebo* and *Murman Seafood*.⁵⁹ *Norebo* is owned by the Russian-Norwegian oligarch Vitaly Orlov.⁶⁰ The EU sanction of them was in reality targeting Norway, since the two companies held Norwegian cod quotas and largely exported via Norway.

Norwegian companies' engagement in shipping services, supplies, and crew recruitment involving Russia represents a clear security threat to Norway and Europe.

Russian **fishing vessels** in Norway have unleashed clear security threats:

In May 2025, the Russian trawling company **Norebo** came under EU sanctions, and a few months later Norway joined the restrictions. The grounds for the sanctions were *"suspicious patterns of vessel movement that were inconsistent with fishing activity – for example, lingering near critical infrastructure and military facilities to conduct espionage missions in the North and Baltic Seas"*.⁶¹

The **Murman Seafood** company was sanctioned together with *Norebo*. The company's vessels *"regularly lingered near Norwegian military facilities, displayed unusual navigational practices before damage was caused to an underwater cable in the North Sea, and made attempts to disembark their crews to inspect a Norwegian bridge of critical importance for military logistics"*.⁶²

The EU justifies sanctions against fishing companies with reference to *"Russia's maritime doctrine"*, which underlines the strategic importance of civilian vessels and their crews for maritime readiness, in particular **through their preparation for wartime conditions**. Even so, Annex VII, Part A of Council Regulation (EU) No 833/2014 allows certain exceptions – for example, the competent authorities may grant permission for the sale to Russia of dual-use goods and technologies, in particular those *"related to maritime safety"*.

Hundreds of **Russian citizens** are licensed to sail in Norwegian territorial waters (*Kystskippersertifikat*), in addition to the almost one thousand Russian citizens licensed as vessel crew.⁶³ In June 2025, a sanctioned Russian ship was loitering over the *Greenland Connect Cable*, after which the same vessel was caught crisscrossing

⁵⁹ Chase, C. (2025). *Russian seafood companies closed out of EU, Norwegian markets, but BRICS countries promise greater cooperation*. SeafoodSource. <https://www.seafoodsource.com/news/supply-trade/russian-seafood-companies-closed-out-of-eu-norwegian-markets-but-brics-countries-promise-greater-cooperation>.

⁶⁰ Staalesen, A. (2026). *Vitaly Orlov's business empire is expanding its fleet of vessels*. The Barents Observer. <https://www.thebarentsobserver.com/news/vitaly-orlovs-business-empire-is-expanding-its-fleet-of-vessels/451460>.

⁶¹ Chase, C. (2025). *Russian seafood companies closed out of EU, Norwegian markets, but BRICS countries promise greater cooperation*. SeafoodSource. <https://www.seafoodsource.com/news/supply-trade/russian-seafood-companies-closed-out-of-eu-norwegian-markets-but-brics-countries-promise-greater-cooperation>.

⁶² The Council of the European Union. (2025). *Council Decision (CFSP) 2025/966 of 20 May 2025 amending Decision (CFSP) 2024/2643 concerning restrictive measures in view of Russia's destabilising activities*. EUR-Lex. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202500966.

⁶³ Stortinget. (2025). *Skriftlig spørsmål fra Sylvi Listhaug (FrP) til fiskeri- og havministeren*. <https://www.stortinget.no/no/Saker-og-publikasjoner/Sporsmal/Skriftlige-sporsmal-og-svar/Skriftlig-sporsmal/?qnid=101965>.

over the *Svalbard Cable* in September.⁶⁴ From July 2025, Norway stopped granting Russian captains permits to sail independently in the territorial waters.⁶⁵

In January 2025, the Norwegian-owned ship **Silver Dana** was detained by police with suspicion of having cut a cable in the Baltic Sea.⁶⁶

On 16 May 2025, the Norwegian-managed ship **HAV Dolphin** circled for ten days outside naval facilities in Germany, at the same time as drone swarms were spotted for three consecutive days. At the same time, the sister ship **HAV Snapper** circled north of the coast of the Netherlands, at the same time as drones interrupted the German police escorting of another Russian vessel.⁶⁷

Russian **LNG tankers** regularly anchor in Norwegian waters. These large ships have ample possibilities of carrying concealed equipment or crews. After 2022, forty LNG tankers have received weather refuge and supplies.⁶⁸ A British-sanctioned LNG tanker called in May 2026, assumedly receiving logistic support.⁶⁹

Sanctions status: The export of ships and vessels is listed in the correlation table for Annex VII, Part A of Council Regulation (EU) No 833/2014. Ban on providing maritime services for the exports of Russian crude oil or oil products above the price cap. Ban on Russian registered vessels entering EU ports and waterways. Ban on providing ship supplies to Russian registered vessels. Ban on transporting Russian coal, crude oil, or oil products to the EU. Ban on transporting Russian gold or diamonds.

⁶⁴ Windward. (2026). *Why Russian-Linked Vessels Are Loitering Above European Subsea Cables*. <https://windward.ai/blog/why-russian-linked-vessels-are-loitering-above-european-subsea-cables/>.

⁶⁵ Mykhailenko, D. (2025). *Norwegian Government Targets Russian Ships in New Maritime Security Measure*. <https://united24media.com/latest-news/norwegian-government-targets-russian-ships-in-new-maritime-security-measure-9820>.

⁶⁶ Staalesen, A. (2025). *Ship suspected of sabotage is detained by Norwegian Coast Guard*. The Barents Observer. <https://www.thebarentsobserver.com/news/ship-suspected-of-sabotage-is-detained-by-norwegian-coast-guard/423992>.

⁶⁷ Van Ess, H. (2025). *They Droned Back*. Digital Digging. <https://www.digitaldigging.org/p/they-droned-back>.

⁶⁸ Humpert, M. (2026). *Russian LNG Carriers Stopped More Than 40 Times Off Northern Norway Since 2024*. High North News. <https://en.highnorthnews.com/politics/russian-lng-carriers-stopped-more-than-40-times-off-northern-norway-since-2024/1111149>.

⁶⁹ Humpert, M. (2026). *UK-Sanctioned Russian LNG Carrier Stops at Northern Norway Port*. High North News. <https://en.highnorthnews.com/politics/uk-sanctioned-russian-lng-carrier-stops-at-northern-norway-port/1111958>.

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