

# Sanctions: Fortnightly Summary



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Authors:



John Binns  
**Partner**



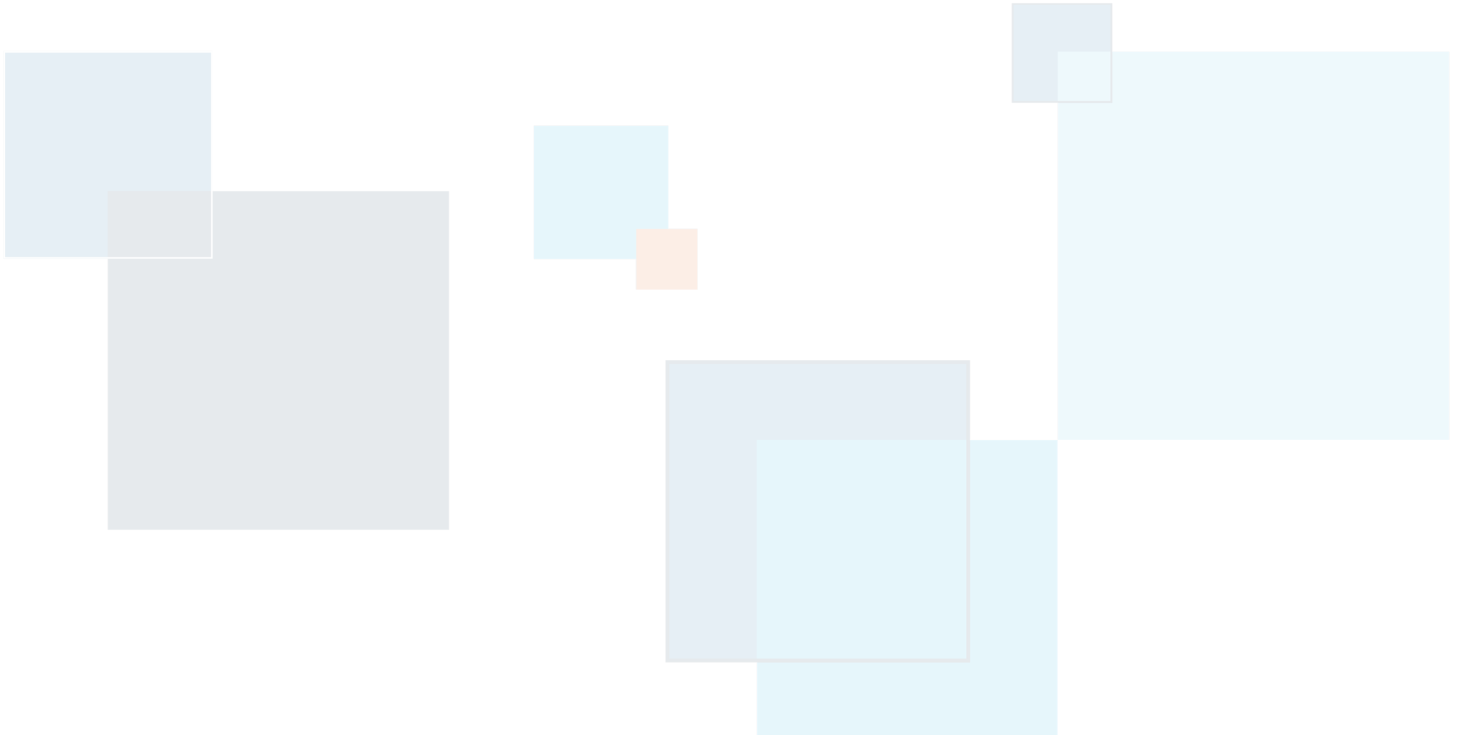
Alexander Gorst  
**Senior Associate**



Evgeni Voznoi  
**Associate**



Dimitri Naumenko-Pronin  
**Legal Assistant**



Welcome to BCL's sanctions and export controls fortnightly round-up, highlighting the notable developments in UK and global sanctions and export controls policy and enforcement.

This edition covers, amongst other matters, the new legal fees OFSI General Licence, US and EU sanctions developments, parliamentary commentary concerning the proceeds of the sale of Chelsea Football Club, and a newly published ECJU notice concerning the UK arms embargo against Armenia and Azerbaijan.

## Global sanctions implementation

### US implements first Russia sanctions under Trump administration [[OFAC press release](#)]

- On 22 October, the Office of Foreign Assets Control (OFAC) imposed the first set of Russia sanctions under the Trump administration by designating Russia's two largest oil companies, OJSC Rosneft and PJSC Lukoil (and certain subsidiaries of these companies). This follows the UK's designation of Rosneft and Lukoil on 15 October.
- OFAC said the designations were imposed due to "Russia's lack of serious commitment to a peace process to end the war in Ukraine", and are aimed at applying pressure on Russia's energy sector and degrading "the Kremlin's ability to raise revenue for its war machine".

### EU adopts 19th package of sanctions against Russia [[European Commission press release](#)]

- On 23 October, the EU rolled out its 19th package of sanctions against Russia, including:
  - **Full transaction ban on Rosneft and Gazprom Neft**, eliminating the previous exemption for Rosneft and Gazprom Neft's oil and gas imports into the EU. The import of oil from third countries, and the transport of oil compliant with the Oil Price Cap to third countries, remains exempted.
  - **A ban on imports of Russian liquefied natural gas**, for long-term contracts as of 1 January 2027, and short-term contracts within six months as of the entry into force of the sanctions. An import ban on a variant of liquefied petroleum gas was also imposed to address circumvention (due to this variant being used to bypass existing restrictions).
  - **117 additional vessels were listed**. A total of 557 vessels in Russia's 'shadow fleet' are now listed by the EU. The vessels are subject to a port access ban and a ban on receiving services.
  - **Anti-circumvention measures**, adding 45 entities to the list of those said to be providing direct or indirect support to Russia's military industrial complex or engaged in sanctions circumvention. This includes 28 established in Russia and 17 in third countries (12 in China, including Hong Kong, 3 in India, and 2 in Thailand).
  - **Financial measures against cryptocurrencies**, including the designation of a rouble-backed cryptocurrency developer, measures prohibiting the use of that stablecoin, and sanctions targeting a cryptocurrency exchange in Paraguay. The European Commission said this "marks a significant evolution in the EU's sanctions regime. By addressing the use of stablecoins and offshore exchanges, the EU aims to close loopholes and reinforce

the integrity of its financial sanctions framework”.

- **Trade measures**, including export restrictions on additional dual-use items and advanced technologies (including materials for the construction of weapons systems); and new export bans on items such as construction materials.

### **EU sanctions against ISIL/Da’esh and Al-Qaeda [[European Commission press release](#)]**

- On 27 October, EU measures against ISIL/Da’esh and Al-Qaeda, as well as those said to be associated with the groups, were extended until 31 October 2026. The sanctions were first imposed in September 2016 and currently apply to 15 individuals and 7 groups.

## **HM Treasury licences**

### **New legal fees General Licence applies to broader range of UK sanctions regulations**

- General Licence [INT/2025/6160920](#), concerning the payment of legal fees in respect of services provided to designated individuals and entities (DPs) under the UK’s Russia and Belarus regimes, expired on 28 October.
- General Licence [INT/2025/7323088](#), which largely mirrors General Licence [INT/2025/6160920](#), came into effect on 29 October and applies more broadly to DPs under regulations issued under the Sanctions and Anti Money Laundering Act 2018, including the UK’s Russia, Global Anti-Corruption and Global Human Rights sanctions regimes.
- The new General Licence does not apply to designations made for the purpose of compliance with UN obligations. The new general licence effectively resets the caps available to law firms for payments from 29 October 2025 to 28 April 2026.

### **Amended General Licence concerning Humanitarian Activity linked to Israel, Palestine and Lebanon**

- On 27 October, General Licence [INT/2023/3749168](#) (Israel, Palestine and Lebanon Humanitarian Activity) was amended to extend the effect of the general licence by a further two years until 14 November 2027. Notably, the general licence amended all references to Occupied Palestinian Territories to Palestine, while all references to conflict have been removed, meaning the permissions are now for activities in relation to those countries, rather than in relation to the conflict.

### **New General Licences concerning Rosneft Deutschland GmbH and RN Refining & Marketing GmbH**

- On 22 October, OFSI issued General Licence [INT/2025/7598960](#) (“Continuation of Business of PJSC Rosneft Oil Company’s German Named Subsidiaries”) which permits certain business operations with Rosneft Deutschland GmbH, RN Refining & Marketing GmbH and any subsidiaries of the two companies, including payments to or from the entities under existing or new contracts, as well as the provision and receipt of economic resources.

## New General Licences concerning the remuneration of the directors and employees of Iranian banks

- On 23 October, OFSI issued General Licence **INT/2025/7628424** (“Interim Necessities”). The General Licence permits the payment of salaries, allowances, redundancies and pensions to the UK employees and directors of Bank Melli, Melli Bank PLC, Bank Saderat Iran, Bank Tejarat, Persia International Bank Plc, Iran Insurance Company, and the UK incorporated subsidiaries of these entities. The General Licence also permits the payment of IT and accountancy fees for services linked with the operation of these entities and their subsidiaries.

## UK designations

- On 20 October, Dimitri Herard, a former Haitian police officer and head of the National Palace General Security Unit, and Kempes Sanon, a Les Argentins gang leader, were designated under the Haiti (Sanctions) Regulations 2022. The designations are aimed at combatting gang violence, political instability and human rights abuses in Haiti. **[OFSI notice]**
- On 21 October, the FCDO removed the proscription of Hay’at Tahrir al-Sham (a Syrian group formerly headed by its new president, Ahmed al-Sharaa) under the Terrorism Act 2000, which previously made it a criminal offence to be a member of or to invite support for the organisation. The move is aimed at facilitating closer engagement with the new Syrian government. **[FCDO press release]**
- On 22 October, 12 individuals and one entity were designated under the Global Irregular Migration and Trafficking in Persons (Sanctions) Regulations 2025 for the purpose of combatting networks responsible for human trafficking. Keir Starmer said there is “a criminal route through the Western Balkans bringing illegal migrants to the UK, and we’re determined to shut it down by working with European partners”. **[OFSI notice; FCDO press release]**
- 23 October, 5 designations made under the Russia (Sanctions) (EU Exit) Regulations 2019 concerning Aleksandr Shulgin, Mihajo Perencevic, Alisher Usmanov, USM Holdings Limited and Narmina Dadashova were varied by the FCDO. **[OFSI notice]**
- On 30 October, Aliakbar Ansari was designated under the Iran (Sanctions) Regulations 2023 for providing financial support to the Islamic Revolutionary Guard Corps, which, the FCDO asserts, issues “targeted threats to carry out hostile acts, including here in the UK”. **[FCDO press release]**

## Parliamentary commentary

### Questions concerning the use of Russian sovereign assets, and the sale proceeds of Chelsea FC

- On 23 October, Lucy Rigby MP, the Economic Secretary to the Treasury, was asked whether her Department is working with EU and G7 partners to coordinate the release of (i) frozen Russian-linked assets and (ii) the proceeds from the sale of Chelsea Football Club.



- Lucy Rigby said, “the Chancellor is actively engaging with EU and G7 partners through regular discussions with G7 finance ministers to explore all viable legal avenues to make use of Russia’s sovereign assets for the benefit of Ukraine, in line with international law”.
- She also said the Government is working to ensure the proceeds from the sale of Chelsea FC are directed towards humanitarian causes in Ukraine; noting that agreement from Fordstam Ltd, the company through which Chelsea was owned, is necessary for the transfer of funds to a charitable foundation. **[UK Parliament record]**

### **Question concerning provision of insurance to vessels transporting Russian oil**

- On 27 October, it was clarified, in response to a question posed by Lord Empey in the House of Lords, that “UK-based insurers are permitted to provide insurance services to vessels transporting Russian origin oil or oil products if those products are shipped below the relevant price cap and the insurers comply with the conditions of the Oil Price Cap general licence”. **[UK Parliament record]**

### **Export controls**

#### **Lifting of arms embargo on Armenia and Azerbaijan**

- On 29 October, the Export Control Joint Unit published a notice stating that the UK arms embargo on Armenia and Azerbaijan has ceased to be in force as of 13 October, disapplying the Organisation for Security and Co-operation in Europe’s arms embargo on exports to both countries (following the US-brokered peace deal between them). **[ECJU notice]**

# Get in touch

+44 (0)20 7430 2277  
law@bcl.com

51 Lincoln's Inn Fields  
London WC2A 3LZ  
DX 37981 Kingsway

www.bcl.com

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London WC2A 3AA

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