

Sanctions: Fortnightly Summary



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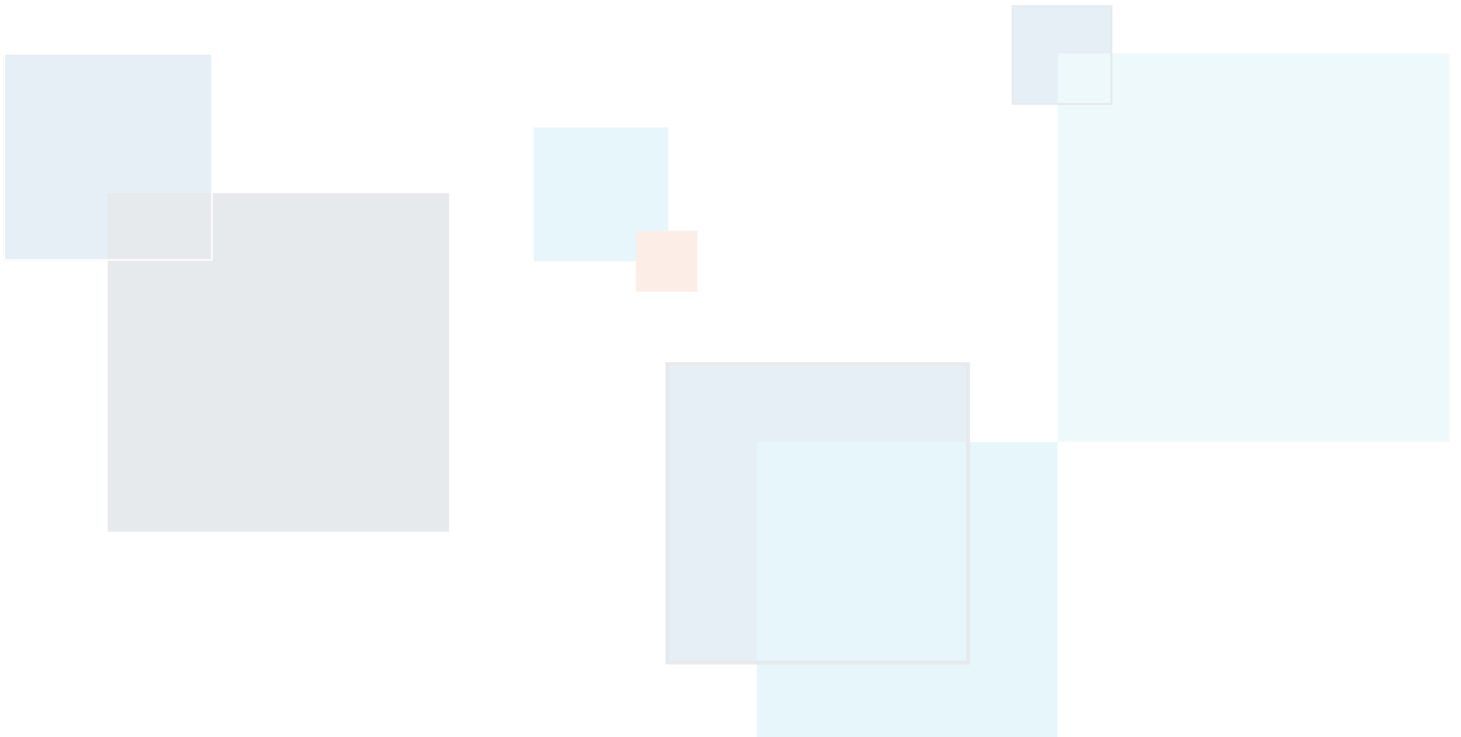
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Welcome to the BCL's sanctions and export controls round-up, highlighting key UK and international developments in sanctions law and enforcement.

This edition overviews notable developments in UK and global sanctions policy, enforcement, and export controls, including an overview of recent amendment and additions to OFSI's General Licences, designations made under the UK's Iran Sanctions Regime, the Colorcon Limited penalty, and updated guidance.

HM Treasury licences

OFSI issues 5 new General Licences, and updates 3 existing General Licences

General Licence amendments

- On 26 September, OFSI amended the General Licences for Permitted Payments by Designated Persons to utility companies ([INT/2022/2300292](#)), and water companies ([INT/2023/3179120](#)), as follows:
 - The reporting conditions now require a DP to report Permitted Payments to HM Treasury within 30 days of the end of a yearly quarter in which the payment was made (replacing the requirement to report payments to utilities companies on a monthly basis, and payments to water companies on a quarterly basis).
 - The reference to frozen UK bank accounts has been removed to clarify that payments by DPs are not restricted to those made from frozen funds.
- On 26 September, General Licence [INT/2022/2104808](#) ("Bank Fees") was also amended to remove the restriction that banks may only take the payment of Service Fees from accounts frozen under the Russia Regulations, which now permits banks to take service fee payments from any accounts held by a DP.

General Licences issued

- On 26 September, General Licence [INT/2025/7328184](#) ("Payments by Revenue Authorities") was issued. The General Licence allows HM Revenue & Customs to make payments owed to a DP (to a UK frozen account) in discharge (or partial discharge) of an obligation which arose before the date of their designation (including any interest on the amount owed).
- On 29 September, OFSI issued:
 - General Licence [INT/2025/7363752](#) permitting certain activities necessary for the continued operations of the Shah Deniz Project, which concerns the development of the world's largest gas-condensate field.
 - General Licences [INT/2025/7345264](#), [INT/2025/7345664](#) and [INT/2025/7345464](#), granted under the UK's Iran Sanctions Regime, permitting wind down and divestment activities concerning transactions involving UK based firms, Iranian Banks based outside of the UK, and those based in the UK.

Designations / De-listings

The UK, France and Germany (the “E3”) reimpose sanctions on Iran following conclusion of the “snapback” process [\[FCDO press release\]](#)

- A range of UN, EU and US sanctions on Iran were lifted following the 2015 nuclear deal aimed at preventing the use of Iran’s nuclear program for the development of weapons. The E3 will reimpose certain sanctions on Iran due to non-compliance with the deal. [\[House of Commons research briefing\]](#)
- On 29 September 2025, 62 entities and 9 individuals were designated under the UK’s Iran Nuclear Sanctions Regime. On 1 October 2025, a further 78 entities and 43 individuals were designated following the reimposition of UN sanctions targeting those involved in Iran’s nuclear and ballistic missiles programme. [\[UK sanctions notice dated 29 September; UK sanctions notice dated 1 October\]](#)
- OFSI has updated its [FAQ](#), question 168, to clarify that HM Treasury licences issued prior to 2015 in respect of any re-designated individuals or entities will not be valid.

Designations under the UK’s Counter Terrorism Sanctions Regime

- On 25 September, Rampage Productions and Embers of an Empire, a music production company and band, were designated on the basis of their involvement in facilitating, promoting and encouraging terrorism through the dissemination of music. The entities are understood to be owned and managed by Robert Talland, who, together with his son and daughter, were found guilty of racial hatred by creating, performing and distributing neo-Nazi music during a trial in June. [\[OFSI notice; Counter Terrorism Policing notice\]](#)

Designations and de-listing under the UK’s Russia Sanctions Regime

- On 19 September, 2 Georgian individuals, Otar Anzorovich Partskhaladze and Levan Shioyevich Vasadze, a businessman and a politician, were designated on the basis of, inter alia, disseminating pro-Russian disinformation. Two oil tankers were also prescribed for transporting Russian oil to the Georgian port of Batumi as part of Russia’s ‘shadow fleet’. On the same day, 2 entities were also designated. [\[FCDO press release\]](#)
- Yuri Denisov was designated on 23 September on the basis of obtaining a benefit from the Government of Russia by acting as a director of PJSC Moscow Exchange Group, an entity carrying on business in the financial services sector, classed as being of strategic significance to the Government of Russia. [\[UK sanctions notice dated 23 September\]](#)
- Tatiana Evtushenkova, who was designated on the basis of an association with and acting on behalf of Vladimir Evtushenkov, the owner of Sistema JSFC, was de-listed on 22 September. [\[UK sanctions notice dated 22 September\]](#)

Enforcement

OFSI imposes a penalty of £152,750 for breaches of the Russia sanctions regime **[OFSI penalty notice]**

- On 30 September, OFSI published a notice regarding the imposition of a £152,750 penalty on Colorcon Limited, a UK registered company, concerning breaches by Colorcon of regulation 12 of the Russia (Sanctions) (EU Exit) Regulations 2019 (the “Russia Regulations”).
- The breaches involved 79 separate payments, totalling £128,277.72, made by Colorcon’s representative office in Moscow to service providers holding accounts with Alfa Bank (a designated entity).
- While Colorcon provided full disclosure and cooperated with OFSI’s investigation, there was a four-month delay between the company becoming aware of the breach and the disclosure to OFSI; which was not deemed as prompt, as a consequence of which the maximum penalty discount of a possible 50% was reduced to 35%.

“Improving civil enforcement processes for financial sanctions” consultation **[HM Treasury and OFSI notice]**

- A consultation, launched on 22 July, inviting views and comments on proposed measures to enhance the effectiveness of enforcement processes undertaken by OFSI is due to close on 13 October.

Government Strategy

New guidance and sanctions content

- As part of an effort to improve official guidance on the UK sanctions regimes, on 22 September, the Government published a “Starter guide to UK sanctions”. The guide contains a high-level overview of sanctions, prohibitions, the various regimes, exceptions and licensing, amongst other areas. [Starter guide to UK sanctions]
- Along with the above guide, the UK Government published guidance on “How to report a suspected breach of sanctions”, incorporating a guide on reporting suspected breaches and links clarifying reporting obligations. [How to report a suspected breach of sanctions]
- The FCDO has published lists which summarise the key amendments to the Russia Regulations between 2020 and 2025, and the exceptions to trade and transport sanctions imposed under the Russia Regulations. [Amendments to the Russia sanctions regulations; Exceptions to the Russia trade and transport sanctions]

Change of legal basis underpinning HM Treasury annual frozen asset review

- Updated UK financial sanctions general guidance notes that the legal basis of the annual frozen asset review conducted by OFSI has changed from one premised on OFSI’s powers to request information, to a basis now enshrined as an obligation in the relevant sanctions regulations themselves. A person will commit an offence if they fail to, without a reasonable excuse, comply with the annual review. [Guidance]

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