

Sanctions Update: EU, UK, US, and Japan Expand Sanctions and Export Controls Relating to Russia

New rules significantly expand the scope of existing sanctions and export controls on Russia.

This Client Alert is published in the context of ongoing developments and should be read in conjunction with the Latham & Watkins Client Alerts published on [11 March](#), [8 March](#), [1 March](#), and [25 February](#).

This Client Alert summarises the latest sanctions imposed by the EU, the UK, the US, and Japan as of 12 April. Different jurisdictions are introducing new sanctions, export restrictions, and other legal and regulatory measures on a near daily basis. Companies exposed to the developments in Russia should ensure that they obtain up-to-date legal advice before taking any steps that may have legal effects.

EU Sanctions

Latham's 8 March and 1 March Client Alerts discuss the first three of five EU "packages" that have updated the EU sanctions regime. Updates from the fourth and fifth packages are summarised below.

The main EU sanctions regime affecting trade with and investment in Russia is contained in [Council Regulation 833/2014](#) (Regulation 833/2014). Since 8 March, the EU has introduced its fourth and fifth packages of restrictive measures against Russia. In particular, [Council Regulation 2022/394](#), [Council Regulation 2022/428](#), and [Council Regulation 2022/576](#) have each amended Regulation 833/2014 so as to introduce several important new prohibitions.

The EU agreed its fourth package on 15 March and its fifth package on 8 April. The fourth package introduces, among other things: a far-reaching ban on new investment across the Russian energy sector, with limited exceptions for civil nuclear energy and the transport of certain energy products back to the EU; a full prohibition on any transactions with certain Russian State-owned enterprises across different sectors; an export ban on listed luxury goods; an import ban on certain listed iron and steel products; and a ban on the rating of Russia and Russian companies by EU credit rating agencies.

The fifth package introduces, among other things: an import ban on all forms of Russian coal; further financial measures including a full transaction ban and asset freeze on four major Russian banks; a prohibition on providing high-value cryptoasset services to Russia; an entry ban on Russian-flagged vessels to EU ports; a broad prohibition on "any road transport undertaking established in Russia" from

transporting goods by road within the EU; further targeted export bans in areas in which Russia is particularly dependent on EU supplies (e.g., advanced semiconductors, sensitive machinery, transportation, and chemicals); additional import bans; and a prohibition on the participation of Russian nationals and entities in procurement contracts in the EU.

[Council Regulation 2022/394](#) introduces the following prohibition:

- **Maritime navigation equipment (Article 3f):** Subject to limited exceptions, Member States are prohibited from supplying, transferring, or exporting, directly or indirectly, or providing financial, technical, brokering, or other services in relation to maritime navigation goods and technology listed in Annex XVI of Regulation 833/2014 to Russia or for use in Russia or on any Russian-flagged vessel.

[Council Regulation 2022/428](#) introduces the following new measures:

- **Transactions with certain State-owned entities (Article 5aa):** Member States are prohibited from engaging in any kind of transaction, directly or indirectly, with (a) the publicly owned or controlled entities listed in new Annex XIX, (b) their (more than 50% owned) non-EU subsidiaries, (c) and entities acting on behalf or at the direction of an entity falling under (a) or (b). Annex XIX includes the following entities:
 - Opk Oboronprom
 - United Aircraft Corporation
 - Uralvagonzavod
 - Rosneft
 - Transneft
 - Gazprom Neft
 - Almaz-antey
 - Kamaz
 - Rostec (Russian Technologies State Corporation)
 - JSC PO Sevmash
 - Sovcomflot
 - United Shipbuilding Corporation

This ban does not apply until 15 May 2022 in respect of contracts concluded before 16 March 2022. Other exceptions include transactions that are strictly necessary for the purchase, import, or transport of fossil fuels, including natural gas, oil, and refined petroleum products, as well as titanium, aluminium, copper, nickel, palladium, and iron ore from or through Russia into the EU, a country of the EEA, Switzerland, or the Western Balkans, or transactions related to energy projects outside Russia in which a listed legal person, entity, or body is a minority shareholder.

- **Investment in the Russian energy sector (Article 3a):** Member States are prohibited from participating in, providing financing, including loans or credit (including by equity capital) to, or creating new joint ventures with any entity or body incorporated or constituted under the law of Russia or any other third country and operating in the energy sector in Russia. Member States are also prohibited from providing investment services related to these activities. However, by way of derogation, Member State competent authorities may authorise such activities if they determine that they are necessary for ensuring critical energy supply within the EU, as well as the transport of natural gas and oil from or through Russia into the EU, or if the activities exclusively concern a legal

person, entity, or body operating in the energy sector in Russia owned by a legal person, entity, or body that is incorporated or constituted under the law of a Member State.

- **Export of equipment, technology, and services for the energy sector (Article 2):** Member States are prohibited from selling, supplying, transferring, or exporting to or for use in Russia certain listed goods or technology intended for the energy industry in Russia. This prohibition excludes goods or technology for the nuclear industry. Member States may obtain authorisation if such transaction is necessary for the critical energy supply of the EU or intended for the use of an entity owned by an EU-incorporated entity or constituted under the law of a Member State.
- **Import of iron and steel (Article 3g):** Member States are prohibited from importing listed iron and steel products if they originate in Russia or have been exported from Russia. Member States are also prohibited from purchasing or transporting those products if they originate or are located in Russia. The provision of technical assistance, brokering services, financing or financial assistance, including financial derivatives, as well as insurance and re-insurance related to the foregoing is also prohibited. The prohibitions do not apply until 17 June 2022 with respect to contracts concluded before 16 March 2022, or ancillary contracts necessary for the execution of such contracts.
- **Export of luxury goods (Article 3h):** In a broad new ban, Member States are prohibited from selling, supplying, transferring, or exporting to Russia or for use in Russia all goods defined as “luxury goods”. The goods subject to this prohibition (listed in Annex XVIII) are extensive, and all exporters to Russia should check this list. Goods are subject to this prohibition if the value of the relevant good (per item) is greater than €300, unless stated otherwise. The value is assessed based on the statistical value of the goods in the export declaration, and is defined as the price actually paid or payable for exported goods, excluding arbitrary or fictitious values and adjusted for incidental expenses such as transport. Goods subject to the ban include:
 - Food and drink (e.g., caviar, truffles, wine, beer, spirits)
 - Jewellery
 - Clothes and shoes
 - Technology
 - Cosmetic goods
 - Watches and clocks
 - Art and antiques
 - Sports equipment
 - Leather goods
 - Cigars and cigarillos
 - Electronic items for domestic use of value exceeding €750
 - Certain vehicles exceeding €50,000 each and certain engines exceeding €5,000 each
- **Credit rating services (Article 5j):** As of 15 April 2022, Member States will be prohibited from providing credit rating services to any Russian national or natural person residing in Russia or any legal person, entity, or body established in Russia. Member States will also be prohibited from providing such persons with access to any subscription services in relation to credit rating activities. These prohibitions will not apply to nationals of Member States or natural persons with a temporary or permanent residence permit in a Member State.

[Council Regulation 2022/576](#) introduces the following new measures:

- **Russian vessels (Article 3ea):** From 16 April 2022, Russian-flagged vessels (as defined) will be prohibited from entering EU ports. Member State competent authorities may authorise derogations for certain purposes, including when the port access is necessary for medical, food, energy (e.g., the purchase, import, or transport into the EU of coal and other listed solid fossil fuels until 10 August 2022) or humanitarian purposes.
- **Import prohibitions:** Subject to specific exemptions, Member States are prohibited from purchasing, importing, or transferring, directly or indirectly, into the EU or to provide technical, financial, or brokering assistance or any other services related to the following goods and their use, manufacture, or maintenance:
 - **Goods that generate significant revenue for Russia (Article 3i):** Includes listed goods that generate significant revenue for Russia (e.g., caviar, certain fertilisers, wood and articles of wood, cement) if they originate in Russia or are exported from Russia.
 - **Coal and other fossil fuels (Article 3j):** Includes coal and other listed solid fossil fuels (e.g., lignite and pitch) if they originate in Russia or are exported from Russia.
- **Export of goods enhancing Russian industrial capacities (Article 3k):** Member States are prohibited from exporting to or for use in Russia, or providing associated technical assistance, brokering services, or financing or financial assistance in respect of certain listed goods that could contribute to the enhancement of Russian industrial capacities (e.g., bulbs, silicon, paints and varnishes, printing ink, photographic film, bakery ovens, articles of nickel and tin, various machine tools, worn clothing and clothing accessories). Member States may obtain authorisation in certain cases, including where the Member State competent authority determines the supply may be necessary for humanitarian purposes.
- **Road transport undertakings (Article 3l):** Subject to specific exceptions (including in relation to mail services) or an authorisation (e.g., where necessary for reasons such as humanitarian purposes, or for the purchase, import, or transport into the EU of natural gas and oil), road transport undertakings established in Russia are prohibited from transporting goods by road within the territory of the EU, including in transit.
- **Provision of cryptoasset services (Article 5b):** Subject to limited exceptions, Member States are prohibited from providing cryptoasset wallet, account, or custody services to Russian nationals or natural persons residing in Russia, or legal persons, entities, or bodies established in Russia, if the total value of cryptoassets of the natural or legal person, entity, or body per wallet, account, or custody provider exceeds €10,000.
- **Services related to trusts (Article 5m):** In a potentially far-reaching provision, Member States are now prohibited from registering or providing a registered office, business, or administrative address as well as management services to a trust or similar legal arrangement having as “trustor” or beneficiary: (a) Russian nationals or natural persons residing in Russia; (b) legal persons, entities, or bodies established in Russia; (c) legal persons, entities, or bodies whose proprietary rights are directly or indirectly more than 50% owned by a natural or legal person, entity, or body referred to in points (a) or (b); (d) legal persons, entities, or bodies controlled by a natural or legal person, entity, or body referred to in points (a), (b), or (c); or (e) a natural or legal person, entity, or body acting on

behalf or at the direction of a natural or legal person, entity, or body referred to in (a), (b), (c), or (d). Further, as of 10 May 2022, Member States will be prohibited from acting as or arranging for another person to act as a trustee, nominee shareholder, director, secretary, or a similar position for a trust or similar legal arrangement as referred to above.

These prohibitions do not apply to operations that are strictly necessary for the termination by 10 May 2022 of contracts concluded before 9 April 2022 or ancillary contracts necessary for the execution of such contracts. They also do not apply where the trustor or beneficiary is a national of a Member State or a natural person having a temporary or permanent residence permit in a Member State.

Asset-Freeze Designations

The EU has designated additional entities on the [EU Consolidated Financial Sanctions List](#), including Bank Otkritie, Novikombank, Sovcombank, and VTB Bank. This means that, subject to very limited exceptions: (a) all funds and economic resources belonging to, owned, held, or controlled by them or natural or legal persons, entities, or bodies associated with them shall be frozen; and (b) no funds or economic resources shall be made available, directly or indirectly, to or for their benefit or that of natural or legal persons, entities, or bodies associated with them. With the exception of Novikombank, these entities are already included on the UK Consolidated List of Financial Sanctions Targets.

Other Amendments

The latest amendments also introduce prohibitions relating to the award and execution of certain public or concession contracts, as well as prohibitions on financing and financial assistance to Russian entities relating to Euratom contracts/programmes.

Belarus

[Council Regulation 2022/577](#), amending [Regulation \(EC\) No 765/2006](#) concerning restrictive measures in view of the situation in Belarus, introduces the following new measures, mirroring some of the prohibitions in amended Regulation 833/2014:

- Member States are prohibited from selling, supplying, transferring, or exporting banknotes denominated in any official currency of a Member State to Belarus or to any natural or legal person, entity, or body in Belarus, including the government and the Central Bank of Belarus, or for use in Belarus.
- Subject to specific exemptions (including in relation to mail services) or an authorisation (e.g., where necessary for limited reasons, including humanitarian purposes and the purchase, import, or transport into the EU of natural gas and oil), road transport undertakings established in Belarus are prohibited from transporting goods by road within the territory of the EU, including in transit.

UK Sanctions

The UK's sanctions are implemented through the [Russia \(Sanctions\) \(EU Exit\) Regulations 2019](#) (the UK Russia Regulations). Latham's [8 March](#) Client Alert summarises the most significant amendments introduced to the UK sanctions regime.

Since 8 March, the following instruments have amended the UK Russia Regulations:

- The [Russia \(Sanctions\) \(EU Exit\) \(Amendment\) \(No. 6\) Regulations 2022](#) (Amendment No. 6)
- The [Russia \(Sanctions\) \(EU Exit\) \(Amendment\) \(No. 7\) Regulations 2022](#) (Amendment No. 7)

On 31 March, the UK Office of Financial Sanctions Implementation (OFSI) published [updated guidance](#) that reflects some of the latest changes to the UK Russia Regulations.

Amendment No. 6 introduces the following new provisions:

- **Aviation:** Aircraft that are registered in Russia or owned, chartered, or operated by a designated person or person connected with Russia as defined in the UK Russia Regulations are prohibited from overflying or landing in the UK, subject to safety-related exceptions. In addition, the Civil Aviation Authority (CAA) is prohibited from registering aircraft owned, operated, or chartered by demise by a designated person. The new provisions also confer powers on:
 - Air traffic control to direct Russian aircraft not to enter UK airspace or leave UK airspace by a specified route;
 - Airport operators to direct Russian aircraft not to take off land;
 - The CAA to refuse, suspend, or revoke permissions in respect of Russian aircraft; and
 - The Secretary of State to direct air traffic control, airport operators, or the CAA to exercise their powers under these measures and in particular to direct airport operators to detain or secure the movement of Russian aircraft.
- **Trade:** Amendment No. 6 extends the prohibitions on (a) exporting restricted goods and technology to or for use in Russia to include aviation and space goods and technology and (b) providing insurance and reinsurance to a person connected with Russia or for use in Russia to apply to aviation and space goods or technology.

Amendment No. 7 introduces the following new provisions:

- **Luhansk and Donetsk-related sanctions:** Amendment No. 7 extends existing financial, trade, aircraft, and shipping sanctions relating to Crimea to the “non-government controlled areas of the Donetsk and Luhansk oblasts” of Ukraine. The areas affected are defined in accordance with Decree Number 32/2019 issued by the President of Ukraine on 7 February 2019 under Article 1 of the Law of Ukraine of 18 January 2018 Nr. 2268-VIII.
- **Aviation and shipping:** The new measures prohibit the provision of technical assistance relating to ships or aircraft to or for the benefit of a designated person, subject to certain limited exceptions.

The UK has also added entities to the [UK Consolidated List of Financial Sanctions Targets](#), including Gazprombank, Sberbank, Credit Bank of Moscow, Russian Railways as well as Boris Rotenberg, and Sergey Anatolyevich Kogogin (director general of Kamaz PJSC).

Economic Crime (Transparency and Enforcement) Act

The Economic Crime (Transparency and Enforcement) Act, which received royal assent on 15 March 2022, makes significant changes to the UK sanctions regime, including to allow the Treasury to introduce regulations that remove knowledge requirements for persons on whom it imposes monetary penalties. This will create a strict civil liability test for monetary penalties incurred for breaches of financial sanctions.

General Licences

Since 8 March 2022, the UK has published the following General Licences:

- [General Licence INT/2022/1327076](#) permits Chelsea FC to continue certain operations, notwithstanding that Roman Abramovich has been designated as an asset-freeze target. The football club may pay players and staff, incur reasonable expenses connected to hosting and travelling to fixtures, receive payments from broadcasters if such payments are frozen on receipt, and make payments for existing inter-club obligations. This licence expires on 31 May 2022.
- [General Licence INT/2022/1381276](#) permits the provision of financial services for the purpose of winding down derivatives, repurchase, and reverse transactions entered into before 1 March 2022 with the Russian Central Bank, National Wealth Fund, and Ministry of Finance. This licence expires on 2 May 2022.
- [General Licence INT/2022/1424276](#) provides for the winding down of transactions with Alfa Bank JSC, GazPromBank, Rosselkhozbank, SMP Bank, and Ural Bank for Reconstruction and Development that would otherwise breach the asset-freeze and capital and financial market restrictions of the UK Russia Regulations. This licence expires on 23 April 2022.
- [General Licence INT/2022/1438977](#) provides that business operations with GEFCO or its subsidiaries can continue and allows for payments made by GEFCO's subsidiaries to be made for the purpose of basic needs, such as salary payments. It also allows the processing of payments or transactions related to the sale and transfer of GEFCO's shares by Russian Railways. This licence expires on 23 May 2022.
- [General Licence INT/2022/1469378](#) provides for the winding down of transactions with Sovcomflot and its subsidiaries that would otherwise breach the asset-freeze and capital and financial market restrictions of the UK Russia Regulations. This licence expires on 15 May 2022.
- [General Licence INT/2022/1495176](#) permits the receipt and onward transfer of non-rouble interest or principal payments made by the Russian Central Bank, National Wealth Fund, or Ministry of Finance. This licence applies to debt issued before 1 March 2022 and expires on 30 June 2022.
- [General Licence INT/2022/1277876](#), which permits payments for the basic needs of VTB Bank's subsidiaries to be made and received, has been amended to allow payments or any other action in connection with insolvency proceedings related to VTB Capital plc.
- [General Licence INT/2022/1544176](#) provides for the winding down of transactions involving the Credit Bank of Moscow and expires on 6 May 2022.
- [General Licence INT/2022/1277877](#), which permits correspondent banking relationships with Sberbank for the provision of energy products (crude oil, petroleum products, and gas) in the UK, has been amended to extend the licence to asset-freeze provisions, as Sberbank is now a designated asset-freeze target. This licence expires on 24 June 2022.

US Sanctions

On 6 April 2022, President Biden signed a new [Executive Order](#) (the April 6 Order), which imposes additional prohibitions on new investments in Russia and designates additional Russian financial institutions. Previous Executive Orders related to Russia include [Executive Order 14066](#) of 8 March 2022 and [Executive Order 14068](#) of 11 March 2022.

The April 6 Order prohibits:

- New investment in the Russian Federation by a US person (i.e., a US citizen, a US permanent resident, entities organised under US law and their foreign branches, as well as anyone physically present in the US);
- The exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a US person, of any category of services as may be determined by the Secretary of the Treasury, in consultation with the Secretary of State, to any person located in the Russian Federation; and
- Any approval, financing, facilitation, or guarantee by a US person, wherever located, of a transaction by a foreign person where the transaction by that foreign person would be prohibited by the April 6 Order if performed by a US person or within the United States.

Ban on New Investment in the Russian Federation

The April 6 Order prohibits new investment in the Russian Federation by a US person, wherever located. US persons are also prohibited from approving, financing, facilitating, or guaranteeing any investments in the Russian Federation.

The April 6 Order's ban on new investments in the Russian Federation raises a number of questions. It does not define what activities constitute a "new investment". In the context of the prior ban on investments by US persons in Russia's energy sector, the subject of Executive Order 14066, the Office of Foreign Assets Control (OFAC) issued [FAQ 1019](#), which broadly defines the term "new investment" to include "a commitment or contribution of funds or other assets for, or a loan or other extension of credit". Whether this definition or a similar definition applies in the context of the April 6 Order's prohibition on new investments in the Russian Federation is unclear. Public reports quoting US government officials suggest that the new investment ban "includes a ban on venture capital and mergers",¹ and "would bar investment by domestic companies in their own facilities in Russia or in new companies through mergers or venture capital".² According to one article, Deputy Treasury Secretary Wally Adeyemo suggested that the new investment ban prohibits US parties from investing in Russian firms' equity and debt and investment funds, and when asked whether the ban would prohibit companies already in Russia from further funding those operations, the response was that the Treasury Department was consulting with the private sector.³ Given the significant uncertainty, OFAC is likely to provide additional guidance.

On 7 April 2022, OFAC released [General Licence 25](#), which authorises, with exception, "all transactions ordinarily incident and necessary to the receipt or transmission of telecommunications involving the Russian Federation" and "the exportation or reexportation, sale, or supply, directly or indirectly, from the United States or by US persons, wherever located, to the Russian Federation of services, software, hardware, or technology incident to the exchange of communications over the internet".

New SDN List Designations

On 6 April 2022, OFAC [announced](#) that it added Russia's largest state-owned bank (Sberbank) and largest private bank (Alfa-Bank), as well as a number of Sberbank and Alfa-Bank subsidiaries, to its Specially Designated Nationals and Blocked Persons (SDN) List. OFAC also designated five vessels, family members of President Putin and Foreign Minister Lavrov, and Russian Security Council members that the US determined to be complicit in the war against Ukraine. Pursuant to OFAC's "50 percent rule", entities that are owned 50% or more, by one or more sanctioned parties, should be treated as subject to the same sanctions, even if those parties are not identified on the applicable sanctions list.

Most dealings by US persons with SDNs are prohibited unless licenced, and US persons are obligated to block property and interests in property of an SDN that is within a US person's possession or control. Further, certain significant dealings with SDNs can expose non-US parties to "secondary sanctions".

New General Licences Relating to Sberbank, Alfa-Bank, and Other Designated Financial Institutions

On 6 April 2022, OFAC released additional general licences authorising the "wind down" of transactions involving Sberbank, Alfa-Bank, and other designated financial institutions.

[General License 21](#) and [General License 22](#) authorise all transactions ordinarily incident and necessary to the wind down of transactions involving Sberbank CIB USA, Inc. until 7 June 2022 and most other Sberbank entities until 13 April 2022.

On 12 April 2022, OFAC released [General License 26](#), authorising wind down transactions involving Joint Stock Company SB Sberbank Kazakhstan or Sberbank Europe AG until 12 July 2022.

[General License 23](#) authorises wind down transactions involving Alfa-Bank and its subsidiaries until 6 May 2022.

Separately, OFAC released [General License 8B](#), which authorises energy-related transactions involving certain sanctioned financial institutions including Sberbank and Alfa-Bank, otherwise prohibited by [Executive Order 14024](#), until 24 June 2022.

US Commerce Department Actions

The Commerce Department's Bureau of Industry and Security (BIS) issued a [new rule](#) on 8 April 2022, expanding the restrictions imposed on Russia and Belarus under the Export Administration Regulations (EAR). While the vast majority of items on the Commerce Control List (CCL) already required a licence for Russia and Belarus (or are subject to the licencing authorities of other agencies), this rule imposes new licence requirements for items including certain composite materials, medical products containing certain toxins or genetically modified organisms, hydraulic fluids, pumps, valves, and lower-level machine tools.

- **Licence requirements for all CCL items for Russia and Belarus:** BIS is expanding the licence requirements for Russia and Belarus under the EAR to all items classified under any Export Control Classification Number (ECCN) in any Category 0-9 of the CCL (this licencing requirement previously applied only to items classified in Categories 3-9 of the CCL).
- **Expanded Russia/Belarus foreign direct product (FDP) rule:** Consistent with the expansion of the CCL licencing requirements, BIS is revising the Russia/Belarus FDP Rule, in Section 734.9(f) of the EAR, to require an export licence for foreign-produced items subject to the EAR that are the direct product of US software or technology classified under product groups D or E in any CCL Category.

BIS continues to exempt certain third countries determined to be implementing substantially similar export controls towards Russia and Belarus from the requirements imposed by this rule. These countries, and the extent of their exclusion from FDP restrictions, are identified in Supplement No. 3 to part 746 of the EAR (the Russia Exclusions List). The list of countries was expanded on 12 April 2022 to include Iceland, Liechtenstein, Norway, and Switzerland.

- Consistent with BIS licencing policy, when a licence is required under either rule, licence applications will still be subject to a general policy of denial but may be granted upon case-by-case review in certain circumstances. Further, in certain limited cases, a licence exception may still be used to overcome the licence requirement.
- **New Entity List additions:** On 1 April 2022, BIS [added](#) 120 Russian and Belarusian entities to the Entity List for acquiring and attempting to acquire items subject to the EAR in support of Russia's and Belarus's militaries. Ninety-five of these entities were designated as military end-users and are subject to more restrictive licencing requirements under the Russia/Belarus Military End-User FDP rule, in Section 734.9(g) of the EAR.

Japan Sanctions

Japan has announced further sanctions including the requirement for pre-approval of (a) payment to and (b) capital transactions (i.e., deposit, trust, and loan agreement) with nine Russian banks, three Belarusian banks, 499 Russian/Belarusian individuals, and 38 Russian/Belarusian entities, and a prohibition on exports to 130 Russian/Belarusian entities.

Japan has also introduced a luxury goods ban, which covers a number of items, including those listed below, if they are worth more than the specified amount (which is different for each item). This ban took effect on 5 April 2022. The yen threshold is similar to the euro threshold under the EU's corresponding ban for many of the categories. The luxury goods ban extends to, among other items:

- Gold, gold bullion, banknotes
- Alcoholic beverages and ethyl alcohol
- Cigars, cheroots, cigarillos, and cigarettes
- Perfumes and cosmetics
- Fur overcoats and other fur products
- Carpets and other textile floor coverings
- Porcelain tableware and other ceramic products
- Pearls, precious stones, gold, silver, or precious metal products
- Cars, motorcycles
- Watches containing silver, gold, platinum, iridium, osmium, palladium, rhodium, and ruthenium
- Art, collectibles, and antiques

On 12 April 2022, Japan [announced a ban](#) on the import of Russian products, including those listed below. This ban will take effect on 19 April 2022.

- Alcoholic beverages such as vodka
- Woods
- Machinery

On 8 April 2022, Japan announced a ban on (a) new investment in Russia and (b) import of coal, though the details are not available yet.

What's Next?

Further measures are expected within the coming weeks. In particular, the UK has announced a forthcoming ban on new investment in Russia, which, like the recent US ban, could have a potentially broad impact on businesses with a Russian presence. Further, the EU is working on additional proposals to target oil imports as part of its goal to reduce its dependence on energy imports from Russia.

Latham & Watkins is tracking developments across all regions closely and expects that the US, the EU, the UK, and other governments around the world may impose additional rounds of sanctions as events unfold. The firm is well positioned to advise clients on the legal and practical impacts of these measures.

If you have questions about this Client Alert, please contact one of the authors listed below or the Latham lawyer with whom you normally consult:

[Les Carnegie](#)

les.carnegie@lw.com
+1.202.637.1096
Washington, D.C.

[Jeremy Green](#)

jeremy.green@lw.com
+44.20.7710.4561
London

[Eric S. Volkman](#)

eric.volkman@lw.com
+1.202.637.2237
Washington, D.C.

[Joachim Grittmann](#)

joachim.grittmann@lw.com
+49.69.6062.6548
Frankfurt

[Asia Y. Cadet](#)

asia.cadet@lw.com
+1.202.637.2251
Washington, D.C.

[Ehson Kashfipour](#)

ehson.kashfipour@lw.com
+1.202.637.1002
Washington, D.C.

[Damara L. Chambers](#)

damara.chambers@lw.com
+1.202.637.2300
Washington, D.C.

[Robert Price](#)

robert.price@lw.com
+44.20.7710.4682
London

[Andrew P. Galdes](#)

andrew.galdes@lw.com
+1.202.637.2155
Washington, D.C.

[Elizabeth K. Annis](#)

elizabeth.annis@lw.com
+1.202.637.1011
Washington, D.C.

[Matthew Crawford](#)

matthew.crawford@lw.com
+1.617.880.4588
Boston

[Thomas F. Lane](#)

thomas.lane@lw.com
+44.20.7710.3030
London

[Charles Claypoole](#)

charles.claypoole@lw.com
+44.20.7710.1178
London

[J. David Stewart](#)

j.david.stewart@lw.com
+44.20.7710.3098
London

[Ruchi G. Gill](#)

ruchi.gill@lw.com
+1.202.654.7126
Washington, D.C.

[Amaryllis Bernitsa](#)

amaryllis.bernitisa@lw.com
+44.20.7710.4582
London

[Matthew R. Gregory](#)

matthew.gregory@lw.com
+1.202.637.3355
Washington, D.C.

[Hiroaki Takagi](#)

hiroaki.takagi@lw.com
+81.3.6212.7810
Tokyo

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Endnotes

¹ <https://www.reuters.com/world/us-allies-ban-investments-russia-sanction-banks-2022-04-06/>.

² <https://rollcall.com/2022/04/06/biden-to-block-new-investments-in-russia-by-americans/>.

³ <https://money.usnews.com/investing/news/articles/2022-04-07/u-s-treasurys-adeyemo-lays-out-plan-to-starve-russias-war-machine>.