

Overview of current sanctions measures concerning Belarus

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1. United States (US) sanctions concerning Belarus

Arms embargo

- Policy of denial for defense articles and defense services to Belarus.

Asset freeze

- All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of US persons, including their overseas branches, of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in by listed persons.
- Blocking Sanctions against Belarusian State-Owned Banks, Belarusian Defense and Security Industries, and Senior Security Officials.
- Designation of two major State-owned Banks: Belarussian Bank of Development and Reconstruction Belinvestbank Joint Stock Company (Belinvestbank) & Bank Dabrabyt Joint-Stock Company (Bank Dabrabyt).

- Prohibition from engaging in “any transaction involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation, including any transfer of assets to such entities or any foreign exchange transaction for or on behalf of such entities.”

Travel ban

- The unrestricted immigrant and nonimmigrant entry into the United States of listed persons would be detrimental to the interests of the United States, and the entry of such persons into the United States, as immigrants or nonimmigrants, is hereby suspended.

Export Controls

- A license is required, excluding deemed exports and deemed reexports, to export, reexport, or transfer (in-country) to or within Belarus any item subject to the EAR and specified in any Export Control Classification Number (ECCN) on the CCL.
- A license is required to reexport, export from abroad, or transfer (in-country) to any destination any foreign-produced item subject to the EAR under the Russia/Belarus FDP rule in the EAR.
- A license is required to reexport, export from abroad, or transfer (in-country) to or within any destination any foreign-produced item subject to the EAR under § 734.9(g) of the EAR.
- A license is required to export, reexport, or transfer (in-country) to or within Russia or Belarus any ‘luxury good’ subject to the EAR, as identified in supplement no. 5 to this part.
- Highly restrictive policy of denial for the review of license applications for exports, reexports, and transfers (in-country) to the listed entities of all items subject to the EAR and prohibition on the use of all license exceptions for such transactions.
- Policy of denial for all items subject to the EAR apart from food and medicine designated at EAR99, which will be reviewed on a case-by-case basis, for all Belarusian entities listed under the Entity List (EAR - Supplement No. 4 to Part 744).
- Russia/Belarus FDP rule establishes a control over foreign-produced items that are:
 - (i) the direct product of certain U.S.-origin software or technology subject to the EAR; or
 - (ii) produced by certain plants or major components thereof which are themselves the direct product of certain U.S.-origin software or technology subject to the EAR.

The Russia/Belarus FDP rule does not apply to foreign-produced items that would be designated as EAR99 (items not listed on the CCL).

- Russia/Belarus MEU FDP rule applies to foreign-produced items that are:
 - (i) the direct product of any software or technology subject to the EAR that is on the CCL; or
 - (ii) produced by certain plants or major components thereof which are themselves the direct product of any U.S.-origin software or technology on the CCL.

Source: <https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information/belarus-sanctions> & https://www.bis.doc.gov/index.php/component/docman/?task=doc_download&gid=2383 & <https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-126/section-126.1>

2. European Union (EU) sanctions concerning Belarus

Arms embargo

- The sale, supply, transfer or export of arms and related material of all types, including weapons and ammunition, military vehicles and equipment, paramilitary equipment and spare parts for the aforementioned, as well as equipment which might be used for internal repression, to Belarus by nationals of Member States or from the territories of Member States or using their flag vessels or aircraft, shall be prohibited.
- Prohibition of the sale, supply, transfer or export of firearms, their parts and essential components and ammunition

Export restrictions

- The direct or indirect sale, supply, transfer or export of equipment, technology or software intended primarily for use in the monitoring or interception by, or on behalf of, the Belarusian authorities of the internet and of telephone communications on mobile or fixed networks, including the provision of any telecommunication or internet monitoring or interception services of any kind, shall be prohibited.
- The direct or indirect sale, supply, transfer or export of all dual-use goods and technology shall be prohibited.
- It shall be prohibited to sell, supply, transfer or export, directly or indirectly, goods and technology which might contribute to the military and technological enhancement of Belarus, or to the development of its defence and security sector, whether or not originating in the Union, to any natural or legal person, entity or body in Belarus or for use in Belarus.

- The direct or indirect sale, supply, transfer or export to any natural or legal person, entity or body in Belarus or for use in Belarus of goods used for the production or manufacturing of tobacco products, shall be prohibited.
- The purchase, import or transfer, directly or indirectly, from Belarus of mineral fuels, bituminous substances and gaseous hydrocarbon shall be prohibited.
- It shall be prohibited to sell, supply, transfer or export, directly or indirectly, certain machinery, whether or not originating in the Union, to any person, entity or body in Belarus or for use in Belarus.
- Restrictions on goods used by Russia for its war of aggression against Ukraine, including semiconductor devices, electronic integrated circuits, manufacturing and testing equipment, photographic cameras and optical components.

Import restrictions

- The purchase, import or transfer from Belarus of potassium chloride ('potash') products shall be prohibited.
- It shall be prohibited to import, directly or indirectly, wood, rubber and steel products into the Union if they:
 - (i) originate in Belarus; or
 - (ii) have been exported from Belarus

Financial restrictions

- All funds and economic resources belonging to, owned, held or controlled by persons, entities or bodies listed shall be frozen.
- It shall be prohibited to provide public financing or financial assistance for trade with, or investment in, Belarus.
- It shall be prohibited to directly or indirectly purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments with a maturity exceeding 90 days.
- Transactions related to the management of reserves as well as of assets of the Central Bank of Belarus, including transactions with any legal person, entity or body acting on behalf of, or at the direction of, the Central Bank of Belarus, are prohibited.

- It shall be prohibited to list and provide services on trading venues registered or recognised in the Union for the transferable securities of any legal person, entity or body established in Belarus and with over 50 % public ownership.
- It shall be prohibited to directly or indirectly make or be part of any arrangement to make new loans or credit with a maturity exceeding 90 days.
- It shall be prohibited to provide insurance or re-insurance.
- It shall be prohibited to accept any deposits from Belarusian nationals or natural persons residing in Belarus, or legal persons, entities or bodies established in Belarus, if the total value of deposits of the natural or legal person, entity or body per credit institution exceeds EUR 100 000.
- It shall be prohibited for Union central securities depositories to provide any services to any Belarusian national or natural person residing in Belarus or any legal person, entity or body established in Belarus.
- It shall be prohibited to sell transferable securities denominated in any official currency of a Member State to any Belarusian national or natural person residing in Belarus or any legal person, entity or body established in Belarus.
- It shall be prohibited to provide specialised financial messaging services, which are used to exchange financial data, to the legal persons, entities or bodies listed.
- Exclusion of certain Belarusian banks from the SWIFT system.

Travel ban

- Member States shall take the necessary measures to prevent the entry into, or transit through, their territories of persons listed.

Transport

- Member States shall deny permission to land in, take off from or overfly their territories to any aircraft operated by Belarusian air carriers, including as a marketing carrier, in accordance with their national rules and laws and consistent with international law, in particular relevant international civil aviation agreements.
- It shall be prohibited for any road transport undertaking established in Belarus to transport goods by road within the territory of the Union, including in transit.

3. United Kingdom (UK) sanctions concerning Belarus

Arms embargo

- Prohibition on the export, supply, making available and/or transfer of certain goods and technology (directly or via a third person) to, or for use in, Belarus, or to a “person connected with” Belarus.

The goods and technology subject to these prohibitions include certain:

- military items;
 - items that can be used for internal repression;
 - items that can be used for the interception and monitoring of communications;
 - tobacco industry products;
 - EU 'dual use' goods where they are for military use or a military end-user.
- Prohibitions on enabling or facilitating military activities, such as providing technical assistance, armed personnel, financial services or funds, or brokering services in relation to an arrangement whose object or effect is to provide any of the foregoing in a non-UK country, where such provisions enables or facilitates the conduct of military activities carried on or proposed to be carried on by the Belarusian military or any other military end-user who is a person connected with Belarus.

Financial sanctions

- Prohibition on dealing with funds or assets/goods/services owned, held or controlled by a financial sanctions target;
- Prohibition on making funds or assets/goods/services available directly or indirectly to a financial sanctions target or to any person for the benefit of a financial sanctions target.
- Prohibition to provide financial services, including payment processing services, or funds in pursuance of an arrangement whose object or effect is the export or supply of restricted goods or technology, or related technical assistance.
- Prohibition to grant a loan or credit, or enter into an arrangement to grant a loan or credit, with a maturity exceeding 90 days, to
 - Belarus;
 - a Belarusian authority;
 - an entity wholly owned by Belarus or a Belarusian authority;

- a credit or financial institution majority owned by Belarus or a Belarusian authority;
 - an entity incorporated or constituted under the law of a country other than the UK and majority owned by said credit or financial institutions;
 - anyone acting on behalf or at the direction of the above.
- Prohibitions on the provision of technical assistance, financial services, funds and brokering services relating to import of potash, iron and steel products.

Trade sanctions

- The import, acquisition or supply/delivery to another country of potash and petroleum products which originate from Belarus, are located in Belarus or are shipped through Belarus is prohibited.
- Prohibition to direct or indirect provision of interception and monitoring services to, or for the benefit of, the government of Belarus.
- Prohibition on the export, supply, delivery, making available and transfer of dual-use goods and technology to, or for use in, Belarus, or to a person connected with Belarus, irrespective of end-user. This also applies to the provision of related technical assistance, financial services, funds and brokering services. These replace the previous prohibitions relating to dual-use goods and technology to, or for military use in, Belarus.
- Prohibition on the export, supply, delivery, making available and transfer (as well as the provision of related technical assistance, financial services, funds and brokering services) of:
 - critical industry goods and technology
 - quantum computing and advanced materials
 - oil refining goods and technology

to, or for use in, Belarus, or to a person connected with Belarus.

- Prohibition on the export, supply, delivery and making available of luxury goods to, or for use in, Belarus, or to a person connected with Belarus.
- Expanded definition of 'potash' and new prohibition on the import of 'mineral products', replacing 'petroleum products' to ensure it captures a wider range of oils and other products.
- Prohibition on the import of iron and steel products, which are consigned from or originate in Belarus.
- Prohibition on the import of goods such as gold which may have originated in Russia.

- Prohibition on the import of gold, cement, wood and rubber to the UK from Belarus.
- Prohibition on the export to Belarus from the UK of banknotes and machinery, alongside goods, technologies and materials that could be used to produce chemical and biological weapons.
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Aviation

- Aviation restrictions prevent Belarusian aircraft from overflying or landing in the UK; and the provision of technical assistance, including repair and maintenance services, to aircraft related to designated persons.

Transport

- Prohibition on Belarusian ships, and other ships from entering ports in the United Kingdom
- Prohibition on the registration of ships on the UK Ship Register where they are owned, controlled, chartered or operated by a designated person or persons connected with Belarus, or where they are a specified ship, and confer powers on the Secretary of State to direct the UK Ship Registrar to terminate the registration of such ships.

Insurance

- UK persons and British businesses must not provide insurance or reinsurance services to
 - Belarus;
 - a specified Belarusian authority;
 - an entity wholly owned by Belarus or a Belarusian authority; anyone acting on their behalf or at their direction.

Media

- Social media companies and internet service providers will restrict access to the websites of sanctioned Belarusian media organisations, as is already the case for sanctioned Russian organisations.

Source: <https://www.gov.uk/government/collections/uk-sanctions-on-the-republic-of-belarus>

4. Canada sanctions concerning Belarus

Canada imposes a dealings prohibition, an effective asset freeze, on designated persons. The Regulations prohibit any person in Canada or any Canadian outside Canada from:

- dealing in property, wherever situated, that is owned, held or controlled by listed persons or a person acting on behalf of a listed person;
- entering into or facilitating any transaction related to a dealing prohibited by these Regulations;
- providing any financial or related services in respect of a dealing prohibited by these Regulations;
- making available any goods, wherever situated, to a listed person or a person acting on behalf of a listed person; and
- providing any financial or other related services to or for the benefit of a listed person.

Travel ban

- The listed individuals are also inadmissible to Canada.

Financial sanctions

- Restrictions on certain activities relating to transferrable securities and money market instruments, debt financing, insurance and reinsurance, petroleum products, and potassium chloride products. With some exceptions, the Regulations prohibit persons in Canada or Canadians outside Canada from:
 - dealing in transferable securities and money market instruments, including treasury bills, certificates of deposit and commercial papers but not including instruments of payment, issued by specific entities or individuals identified in the Regulations;
 - transacting in, provide financing for or otherwise dealing in debt of longer than 90 days' maturity, including bonds, loans, debentures, extensions of credit, loan guarantees, letters of credit, bank drafts, bankers' acceptances, discount notes, treasury bills, commercial paper and other similar instruments in relation to specific entities or individuals identified in the Regulations;
 - providing insurance or reinsurance to specific entities or individuals identified in the Regulations;

- importing, purchasing, acquiring, shipping or otherwise dealing in any petroleum goods, wherever situated, that is exported from Belarus, as well as providing any financial, technical or other services such as insurance or reinsurance related to goods subject to this prohibition; and
- importing, purchasing, acquiring, shipping or otherwise dealing in any potassium chloride goods, wherever situated, that is exported from Belarus.

Insurance

- Prohibition on provision of any and all insurance, reinsurance, and underwriting services for aircraft, and aviation and aerospace products either owned by, controlled by, registered to, chartered by, or operated by entities and individuals resident, incorporated, or domiciled in Belarus.

Trade sanctions

- Ban on exporting, selling, supplying or shipping any good, wherever situated, or to provide any technology, to Belarus or to any person in Belarus, if it is described in the Restricted Goods and Technologies List.
- Ban on exporting, selling, supplying or shipping any good or technology, wherever situated, to Belarus or to any person in Belarus if the good or technology is referred to in Schedule 3.
- Ban on exporting, selling, supplying or shipping any luxury good, wherever situated, to Belarus or to any person in Belarus.
- Ban on import, purchase or acquisition by any person in Canada and any Canadian outside Canada, of any luxury good, wherever situated, from Belarus or from any person in Belarus.
- Ban on exporting, selling, supplying or shipping any good that could be used for the manufacturing weapons, wherever situated, to Belarus or to any person in Belarus.
- Causing, facilitating or assisting in prohibited activities is likewise prohibited.

Source: https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/belarus.aspx?lang=eng