



FEDERAL AUTONOMOUS INSTITUTION

RUSSIAN MARITIME REGISTER OF SHIPPING

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Your ref

Date

RS clients

Information letter for shipowners regarding 8th package of EU sanctions

Dear Sirs,

On October 6, 2022, new sanctions of the Council of the European Union were published, which in particular prohibit access to EU ports and locks in the EU territory to any vessel certified by RS.

The prohibition in Article 3ea of the EU Regulation 2022/1904 comes into force on April 8, 2023 and applies to any vessel with RS documents, regardless of the flag.

The prohibition does not apply only in case of a vessel in need of assistance seeking a place of refuge, of an emergency port call for reasons of maritime safety, or for saving life at sea, as well as to access to locks for the purpose of leaving the territory of the EU.

A vessel flying Russian flag and certified by RS, as well as, after 8 April 2023, the vessel certified by RS regardless of the flag, may be authorised to access EU ports by national competent authorities in the EU (port administration) provided that the access to the port is necessary for, unless prohibited by Articles 3m and 3n of EU Regulation 833/2014, the purchase, transfer or import of certain goods, including natural gas, oil and refined petroleum products, titanium, aluminum, copper, nickel, palladium, iron ore, certain chemical and iron products, pharmaceutical, medical, agricultural and food products, including wheat and fertilisers whose import, purchase and transport is allowed under the Regulation; humanitarian purposes; transport of nuclear fuel and other goods strictly necessary for the functioning of civil nuclear capabilities.

In addition, an authorisation to access EU ports may also be granted to a vessel under the following circumstances:

- if, prior to April 16, 2022, a vessel changed the Russian flag or registration in the Russian Federation, which was previously required by the terms of contract, to the flag or registration of any other State and the access is necessary for the completion of renewable energy projects in the EU, provided that the import of such goods is not otherwise prohibited;
- if a vessel has flown Russian Federation flag under a bareboat charter registration initially effected prior to February 24, 2022, and has resumed to fly the flag of the underlying Member State before January 31, 2023, and at the same time a vessel is not owned, chartered, operated or otherwise controlled by a Russian national or any legal person, entity or body constituted in Russia.

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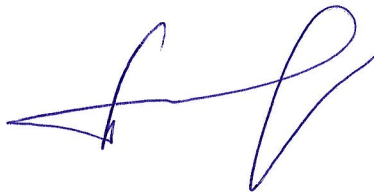
EU shipyards fall within the definition of ports and are subject to the same limitations and exceptions as described above.

In cases where a Russian flagged and RS-classed vessel does not call at EU ports, it is not subject to prohibition measures.

EU Member States are required to withdraw before January 5, 2023, their recognitions issued to RS. Until the moment of withdrawal of those recognitions, EU Member States are not allowed to appoint RS to carry out any statutory survey and issuance, confirmation or extension of certificates. All statutory certificates issued by RS on behalf of EU Member State before October 7, 2022, shall be withdrawn and cancelled before April 8, 2023, by such Member State acting as a flag state.

Currently, all obligations to RS clients are fulfilled as usual.

Director General



Konstantin Palnikov