

UK introduces further Russia sanctions measures

On 30 March 2022, the UK government announced legislation which prohibits maintenance and technical services on aircraft or ships belonging to sanctioned Russian oligarchs or their businesses.

The UK regulations state that a person must not directly or indirectly provide to, or for the benefit of, a designated person technical assistance relating to an aircraft, or a ship. “Technical assistance” is defined in the relevant chapter of the regulation as follows:

“Technical assistance”, in relation to goods or technology, means—

(a) technical support relating to the repair, development, production, assembly, testing, use or maintenance of the goods or technology, or

(b) any other technical service relating to the goods or technology;”

Subject to guidance from OFSI, the definition is very much tied to the goods and technology. However, it is the Club’s view only, in relation to the ship restrictions that it appears to be aimed at ship repair facilities and others who provide repair and maintenance services to Russian vessels. In light of the above, Members are advised to seek their own legal advice on the specific points mentioned herein, this information is provided as guidance only.

Members are further advised to carry out enhanced checks to determine to whom, or for whose benefit, the provision of technical assistance related to ships is being given.