

# RIPE NCC Quarterly Sanctions Transparency Report (Q1 2023)

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## Introduction

This quarterly report provides data on how RIPE NCC members, End Users and legacy resource holders are affected by sanctions, while respecting their confidentiality and privacy.

As an organisation based in the Netherlands, the RIPE NCC must comply with EU sanctions. If we believe that a member or other resource holder is subject to EU sanctions that are applicable to our services, we freeze the registration (not the use) of their resources in the RIPE Database. This means that sanctioned entities cannot acquire further resources or transfer existing ones. However, we do not deregister their resources or terminate their Standard Service Agreement (SSA) if they are RIPE NCC members.

## Sanctions Data

The tables below show any changes since the previous quarter, as well as the total number of resource holders and resources affected. This includes the date of action and what action was taken. The table also shows our relation to a sanctioned entity – whether they are a RIPE NCC member, End User or legacy resource holder. We also specify the country in which the resource holder is legally registered.

## Summary of Changes

Since our last report, two Russian End Users have been confirmed as subject to sanctions, one of which closed a few days later. One Iranian member and one Russian End User have been flagged as non-cooperative\*.

\*If a member or End User does not cooperate with our checks, we cannot investigate and confirm whether they are subject to sanctions or not. We will therefore treat them similarly to being sanctioned and have therefore decided to include these Members and End Users in this report for transparency.

### Changes Since Last Quarter

Date	Action	Relation	Country	IPv4	IPv6	ASNs
14-Nov-2022	Frozen	End User	RU	256	0	1
14-Nov-2022	Frozen	End User	RU	512	0	1
22-Nov-2022	Terminated and resources deregistered due to closure of entity	End User	RU	256	0	1
13-Jan-2023	Marked as non-cooperative	End User	RU	0	0	2
16-Jan-2023	Marked as non-cooperative	Member	IR	1,024	/29	1

### Status on 24 January 2023

Date	Action	Relation	Country	IPv4	IPv6	ASNs
1-Apr-2020	Frozen	Member	IR	17,408	/32	1
1-Apr-2020	Frozen	Member	SY	230,400	/29	1
20-Apr-2020	Frozen	Member	RU	7,552	/32	6
20-Apr-2022	Frozen	Member*	RU	4,096	/32	13
13-May-2022	Frozen	End User	RU	0	0	1
26-Jul-2022	Frozen	Member	GE	1,024	/29	1
17-Oct-2022	Frozen	Member	RU	1,024	/29	2
17-Oct-2022	Frozen	Member	RU	6,400	/29	10
14-Nov-2022	Frozen	End User	RU	512	0	1
13-Jan-2023	Marked as non-cooperative	End User	RU	0	0	2
16-Jan-2023	Marked as non-cooperative	Member	IR	1,024	/29	1
Total				269,440	3x /32, 5x /29	39

\* Member also holds Internet resources as an End User

## Blocked Requests

The following requests were not processed by the RIPE NCC, either because of sanctions applicable to the End User, or due to the inability to complete investigations owing to uncooperative behaviour.

### Blocked Requests

Date	Request	Reason block	Country
17-Oct-2022	AS number request	The RIPE NCC confirmed that sanctions apply to the new End User.	RU
13-Jan-2023	Membership application request	The RIPE NCC was unable to confirm the applicability of sanctions due to non-cooperation.	RU

## Cases Under Investigation

Alongside the number of resource holders confirmed to be subject to EU sanctions that are applicable to our services, there is a much larger number of potential matches under investigation. These statistics show the wider impact that sanctions are having on the Internet as well as the work needed to contact potential matches and request supporting documentation.

Most of these cases turn out to be false positives. However, because there is no grace period allowed for sanctions compliance, potential matches must be treated as though they are sanctioned until our staff can confirm otherwise. This means that we will not process any requests for new resources or to transfer existing ones until a potential sanctions case has been cleared.

Since early 2021, updates to the EU sanctions list have resulted in a total of 988 potential cases requiring investigation. Of these 988 alerts, 360 were in response to Russia's war on Ukraine (115 Members /245 End Users).

### Cases Under Investigation: Status of Cases

Date	Total alerts for investigation	Not yet started	Under Investigation	Confirmed FP or not applicable	Confirmed and applicable
20-Apr-2022	766	362	173	227	4
01-Jul-2022	843	309	207	323	4
17-Oct-2022	932	368	184	372	8
02-Jan-2023	988	384	172	423	9

### Cases Requiring Investigation: Type of Resource Holder

Date	Member	End User	Inter-RIR transfer	Total
20-Apr-2022	343	420	4	766
01-Jul-2022	375	464	4	843
17-Oct-2022	411	517	4	932
02-Jan-2023	443	540	5	988

**Notes:** we also check against the Office of Foreign Asset Control (OFAC) sanctions list, which is maintained by the United States Government. While we are under no obligation to comply with US sanctions, they are a factor for banking institutions in the Netherlands. Apart from making an internal note, no further action is taken if we find a match with the OFAC sanctions list.

Due to concerns on the part of our banks, we are not able to invoice members in Iran and Syria for their fees. We will not close these members for non-payment and we plan to invoice them retroactively for the full amount as soon as this is possible.