

ECONOMICALLY CRITICAL GOODS LIST

The List is comprised of mainly industrial goods subject to EU's restrictive measures¹ for which anomalous trade flows via certain third countries to Russia have been detected. The List may support due diligence and effective compliance by exporters and targeted anti-circumvention actions by customs and enforcement agencies of third countries determined to prevent that their territories are being abused for circumvention of EU sanctions purposes.

These economically critical goods derive from selected groups of mainly industrial goods under HS chapters 28 (Chemicals), 84 (Machinery), 85 (Electronics), 89 (Maritime) and 90 (Optics and instruments). The imports of these goods into third countries from the EU and the rest of the world show a significant increase since the start of the invasion and the imposition of sanctions, which is mirrored by an increase in exports from those same third countries to Russia.

The list only includes goods for which exports above the threshold of 1 million euro over a 12-month period (2022) and with at least 100% increase in exports to Russia from third countries compared to the average of exports for the three preceding 12-month periods before the invasion.

Trade statistics are continuously monitored for detecting trends and updating the composition of the list.

HS6	Description
2829.11	Chlorate of sodium
2847.00	Hydrogen peroxide, whether or not solidified with urea
8407.21	Spark-ignition outboard motors for marine propulsion
8409.99	Parts suitable for use solely or principally with compression-ignition internal combustion piston engines (diesel or semi-diesel engines), other than for aircraft engines
8412.21	Hydraulic power engines and motors, linear acting (cylinders)
8412.29	Hydraulic power engines and motors, other than linear acting
8413.11	Pumps fitted or designed to be fitted with a measuring device, for dispensing fuel or lubricants, of the type used in filling stations or in garages
8413.30	Fuel, lubricating or cooling medium pumps for internal combustion piston engines
8413.50	Reciprocating positive displacement pumps for liquids (excl. those fitted or designed to be fitted with a measuring device, handpumps, fuel, lubricating or cooling medium pumps for internal combustion piston engines and concrete pumps)
8413.60	Rotary positive displacement pumps for liquids (excl. those fitted or designed to be fitted with a measuring device, handpumps, fuel, lubricating or cooling medium pumps for internal combustion piston engines and concrete pumps)

¹ This List does not represent the full list of the EU's trade sanctions against Russia. Please refer to Regulation (EU) 833/2014 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014R0833-20230427>) for the full set of restrictive measures.

8413.81	Pumps for liquids (excl. those fitted or designed to be fitted with a measuring device, handpumps, fuel, lubricating or cooling medium pumps for internal combustion piston engines, concrete pumps, general reciprocating or rotary positive displacement pumps and centrifugal pumps)
8414.10	Vacuum pumps
8414.59	Fans (excl. table, floor, wall, window, ceiling or roof fans, with a self-contained electric motor of an output not exceeding 125 W)
8414.90	Parts of air or vacuum pumps, of air or other gas compressors and fans, of ventilating or recycling hoods incorporating a fan, whether or not fitted with filters, of gas-tight biological safety cabinets, whether or not fitted with filters
8415.10	Air-conditioning machines of a kind designed to be fixed to a window, wall, ceiling or floor, self-contained or "split-system"
8415.83	Air-conditioning machines not incorporating a refrigerating unit, but comprising a motor-driven fan and elements for changing the temperature and humidity, including those machines in which the humidity cannot be separately regulated (excl. those of a kind used for persons, in motor vehicles, and of a kind designed to be fixed to a window, wall, ceiling or floor, self-contained or "split-system")
8417.20	Bakery ovens, including biscuit ovens, non-electric
8418.10	Combined refrigerator-freezers, fitted with separate external doors or drawers, or combinations thereof
8418.21	Household refrigerators, compression-type
8418.30	Freezers of the chest type, not exceeding 800 litres capacity
8418.40	Freezers of the upright type, not exceeding 900 litres capacity
8418.69	Other refrigerating or freezing equipment (excl. heat pumps)
8419.19	Instantaneous or storage water heaters, non-electric (excl. instantaneous gas water heaters and solar water heaters)
8419.40	distilling or rectifying plant
8419.81	Machinery, plant and equipment for making hot drinks or for cooking or heating food (excl. those of a kind used for domestic purposes)
8419.89	Machinery, plant or laboratory equipment, whether or not electrically heated, for the treatment of materials by a process involving a change of temperature (excl. furnaces, ovens and other equipment of heading 8514, machinery or plant used for domestic purposes, non-electric instantaneous or storage water heaters, medical, surgical or laboratory sterilisers, dryers, distilling or rectifying plant, heat-exchange units, machinery for liquefying air or other gases, machinery, plant and equipment for making hot drinks or for cooking or heating food)
8421.19	Centrifuges, including centrifugal dryers (excl. cream separators and clothes dryers)
8421.23	Oil or petrol filters for internal combustion engines
8421.29	Filtering or purifying machinery and apparatus for liquids (excl. for filtering or purifying water and beverages other than water, oil or petrol filters for internal combustion engines)

8421.31	Intake air filters for internal combustion engines
8421.39	Filtering or purifying machinery and apparatus for gases (excl. intake air filters for internal combustion engines, catalytic converters or particulate filters, whether or not combined, for purifying or filtering exhaust gases from internal combustion engines)
8421.99	parts of filtering or purifying machinery and apparatus, for liquids or gases
8422.11	dishwashing machines of the household type
8424.89	Mechanical appliances (whether or not hand-operated) for projecting, dispersing or spraying liquids or powders, n.e.s. (excl. agricultural or horticultural appliances)
8424.90	Parts of mechanical appliances (whether or not hand-operated) for projecting, dispersing or spraying liquids or powders, of fire extinguishers, of spray guns and similar appliances, of steam or sandblasting machines and similar jet projecting machines.
8425.11	Pulley tackle and hoists, powered by electric motor (other than skip hoists or hoists of a kind used for raising vehicles)
8426.11	Overhead travelling cranes on fixed support
8426.41	Cranes, including cable cranes; mobile lifting frames, straddle carriers and works trucks fitted with a crane, self-propelled, on tyres (excl. overhead travelling cranes, transporter cranes, gantry cranes, bridge cranes, mobile lifting frames and straddle carriers, tower cranes, portal or pedestal jib cranes)
8426.99	Ships' derricks, cranes, including cable cranes; mobile lifting frames, straddle carriers and works trucks fitted with a crane (excl. self-propelled and on tyres, overhead travelling cranes, transporter cranes, gantry cranes, bridge cranes, mobile lifting frames and straddle carriers, tower cranes, portal or pedestal jib cranes)
8428.20	Pneumatic elevators and conveyors
8428.31	Continuous-action elevators and conveyors, for goods or materials, specially designed for underground use (excl. lifts and skip hoists, pneumatic elevators and conveyors)
8428.39	Continuous-action elevators and conveyors, for goods or materials (excl. those specially designed for underground use, lifts and skip hoists, pneumatic elevators and conveyors)
8428.90	Machinery for lifting, handling, loading or unloading, n.e.s.
8429.51	Self-propelled front-end shovel loaders
8429.52	Self-propelled mechanical shovels, excavators and shovel loaders (other than front-end), with a 360° revolving superstructure
8429.59	Self-propelled mechanical shovels, excavators and shovel loaders (excl. machinery with a 360° revolving superstructure and front-end shovel loaders)
8430.10	Pile-drivers and pile-extractors
8430.49	Boring or sinking machinery for earth, minerals or ores, not self-propelled (excl. coal or rock cutters and tunnelling machinery)
8430.69	Other moving, grading, levelling, scraping, excavating, tamping, compacting, extracting or boring machinery, for earth, minerals or ores, not self-propelled, n.e.s.

8431.20	Parts of fork-lift trucks and other works trucks fitted with lifting or handling equipment
8431.39	Parts of machinery of heading 8428 (excl. parts of lifts, skip hoists or escalators)
8431.43	Parts for boring or sinking machinery of subheading 8430.41 or 8430.49
8431.49	Parts of machinery of heading 8426, 8429 and 8430, n.e.s.
8443.13	Offset printing machinery (excl. reel fed, sheet fed using sheets with one side not exceeding 22 cm and the other side not exceeding 36 cm in the unfolded state)
8443.19	Printing machinery used for printing by means of plates, cylinders and other printing components of heading 8442 n.e.s.
8443.31	Machines which perform two or more of the functions of printing, copying or facsimile transmission, capable of connecting to an automatic data-processing machine or to a network
8443.32	Machines which only perform one of the functions of printing, copying or facsimile transmission, capable of connecting to an automatic data processing machine or to a network
8443.99	parts and accessories of printers, copying machines and facsimile machines, whether or not combined, n.e.s. (excl. of printing machinery used for printing by means of plates, cylinders and other printing components of heading 8442)
8448.51	Sinkers, needles and other articles used in forming stitches, for machines of heading 8447 or of their auxiliary machinery
8450.11	Fully-automatic household or laundry-type washing machines, including machines which both wash and dry, each of a dry linen capacity not exceeding 10 kg
8451.21	Drying machines, each of a dry linen capacity not exceeding 10 kg
8451.30	Ironing machines and presses (including fusing presses)
8456.11	Machine tools for working any material by removal of material, operated by laser
8456.40	Machine tools for working any material by removal of material, operated by plasma arc processes
8457.10	Machining centres for working metal
8457.30	Multi-station transfer machines for working metal
8459.61	Milling machines for metals, numerically controlled (excl. lathes, way-type unit head machines, boring-milling machines, knee-type milling machines)
8466.10	Tool holders and self-opening dieheads, suitable for use solely or principally with the machines of headings 8456 to 8465
8466.93	Parts and accessories suitable for use solely or principally with the machines headings 8456 to 8461, n.e.s.
8471.30	Portable automatic data-processing machines, weighing not more than 10 kg, consisting of at least a central processing unit, a keyboard and a display

8471.41	Automatic data-processing machines, comprising in the same housing at least a central processing unit, and an input and output unit, whether or not combined (excl. portable automatic data-processing machines, weighing not more than 10 kg, consisting of at least a central processing unit, a keyboard and a display)
8471.49	Automatic data-processing machines, presented in the form of systems (excl. those comprising in the same housing at least a central processing unit, and an input and output unit, whether or not combined, and those portable, weighing not more than 10 kg, consisting of at least a central processing unit, a keyboard and a display)
8471.60	Input or output units for automatic data-processing machines, whether or not containing storage units in the same housing
8471.70	Storage units for automatic data-processing machines
8471.90	magnetic or optical readers, machines for transcribing data onto data media in coded form and machines for processing such data, n.e.s.
8473.30	Parts and accessories (other than covers, carrying cases and the like) suitable for use solely or principally with machines of heading 8471
8474.10	Sorting, screening, separating or washing machines for earth, stone, ores or other mineral substances, in solid (including powder or paste) form
8474.31	Concrete or mortar mixers
8475.29	machines for manufacturing or hot working glass or glassware (excl. machines for making optical fibres and preforms thereof)
8479.10	Machinery for public works, building or the like
8479.82	Mixing, kneading, crushing, grinding, screening, sifting, homogenising, emulsifying or stirring machines
8479.89	Machines and mechanical appliances, n.e.s.
8479.90	Parts of machines and mechanical appliances, n.e.s.
8481.10	Pressure-reducing valves
8481.20	Valves for oleohydraulic or pneumatic transmission
8481.30	Check (non-return) valves for pipes, boiler shells, tanks, vats or the like
8481.40	Safety or relief valves
8482.10	Ball bearings
8482.20	Tapered roller bearings, including cone and tapered roller assemblies
8482.30	Spherical roller bearings
8482.50	Cylindrical roller bearings, including cage and roller assemblies (excl. needle roller bearings)
8482.80	Roller bearings, including combined ball/roller bearings (excl. ball bearings, tapered roller bearings (incl. cone and tapered roller assemblies), spherical roller bearings, needle and other cylindrical roller bearings (incl. cage and roller assemblies))

8482.91	Balls, needles and rollers for ball or roller bearings
8484.10	Gaskets and similar joints of metal sheeting combined with other material or of two or more layers of metal
8484.20	Mechanical seals
8484.90	Sets or assortments of gaskets and similar joints, dissimilar in composition, put up in pouches, envelopes or similar packings
8501.31	DC motors, DC generators, other than photovoltaic, of an output not exceeding 750 W
8501.53	AC motors, multi-phase, of an output exceeding 75 kW, n.e.s.
8501.62	AC generators (alternators), other than photovoltaic, of an output exceeding 75 kVA but not exceeding 375 kVA
8502.11	Generating sets with compression-ignition internal combustion piston engine (diesel or semi-diesel engine) of an output not exceeding 75 kVA
8502.12	Generating sets with compression-ignition internal combustion piston engine (diesel or semi-diesel engine) of an output exceeding 75 kVA but not exceeding 375 kVA
8502.13	Generating sets with compression-ignition internal combustion piston engine (diesel or semi-diesel engine) of an output exceeding 375 kVA
8502.20	Generating sets with spark-ignition internal combustion piston engine
8503.00	Parts suitable for use solely or principally with electric motors and generators, electric generating sets and rotary converters
8507.10	Lead-acid electric accumulators of a kind used for starting piston engines
8507.30	Nickel-cadmium electric accumulators
8508.11	Vacuum cleaners, with self-contained electric motor, of a power not exceeding 1 500 W and having a dust bag or other receptacle capacity not exceeding 20 l
8508.19	Vacuum cleaners, with self-contained electric motor (excl. those of a power not exceeding 1 500 W and having a dust bag or other receptacle capacity not exceeding 20 l)
8508.60	Vacuum cleaners (excl. with self-contained electric motor)
8509.80	Electromechanical domestic appliances, with self-contained electric motor (excl. vacuum cleaners, food grinders and mixers, fruit or vegetable juice extractors)
8515.21	Fully or partly automatic machines and apparatus for resistance welding of metals
8516.31	Electrothermic hairdryers
8516.50	Microwave ovens
8516.71	Electrothermic coffee or tea makers

8516.79	Electrothermic appliances (excl. hairdressing and hand-drying apparatus, space-heating and soil-heating apparatus, instantaneous or storage water heaters, immersion heaters, smoothing irons, microwave ovens, ovens, cookers, cooking plates, boiling rings, grillers, roasters, coffee makers, tea makers and toasters)
8516.80	Electric heating resistors
8517.11	Line telephone sets with cordless handsets
8517.13	Smartphones for cellular networks or for other wireless networks
8523.51	Solid-state, non-volatile data storage devices for the recording of sound or of other phenomena, whether or not recorded, but excluding products of Chapter 37
8528.72	Reception apparatus for television, colour, whether or not incorporating radio-broadcast receivers or sound or video recording or reproducing apparatus, designed to incorporate a colour video display or screen
8531.10	Burglar or fire alarms and similar apparatus
8532.10	Fixed capacitors designed for use in 50/60 Hz circuits and having a reactive power handling capacity of not less than 0,5 kvar (power capacitors)
8536.50	Switches for a voltage not exceeding 1.000 V
8537.10	Boards, panels, consoles, desks, cabinets and other bases, equipped with two or more apparatus of heading 8535 or 8536, for electric control or the distribution of electricity, including those incorporating instruments or apparatus of chapter 90, and numerical control apparatus, other than switching apparatus of heading 8517, for a voltage not exceeding 1 000 V
8538.10	Boards, panels, consoles, desks, cabinets and other bases for the goods of heading 8537, not equipped with their apparatus
8538.90	Parts suitable for use solely or principally with the apparatus of heading 8535, 8536 or 8537 (excl. boards, panels, consoles, desks, cabinets and other bases for the goods of heading 8537, not equipped with their apparatus)
8541.90	Parts of semiconductor devices; of photosensitive semiconductor devices, including photovoltaic cells whether or not assembled in modules or made up into panels; of light-emitting diodes (LED), whether or not assembled with other light-emitting diodes (LED); of mounted piezo- electric crystals
8544.30	Ignition wiring sets and other wiring sets of a kind used in vehicles, aircraft or ships
8544.49	Electric conductors, for a voltage not exceeding 1.000 V, insulated, not fitted with connectors, n.e.s.
8544.60	Electric conductors, for a voltage exceeding 1.000 v, insulated, n.e.s.
8544.70	Optical fibre cables made up of individually sheathed fibres, whether or not assembled with electric conductors or fitted with connectors
8547.20	Insulating fittings for electrical purposes, of plastics

8547.90	Insulating fittings for electrical purposes, of materials other than ceramics or plastics; electrical conduit tubing and joints therefor, of base metal lined with insulating material
8901.10	Cruise ships, excursion boats and similar vessels principally designed for the transport of persons; ferry-boats of all kinds
9001.10	Optical fibres, optical fibre bundles and cables (excl. those of heading 8544)
9015.20	Theodolites and tachymeters (tacheometers)
9020.00	Breathing appliances and gas masks, incl. parts and accessories, n.e.s (excl. protective masks having neither mechanical parts nor replaceable filters)
9027.10	Gas or smoke analysis apparatus

Addressing the circumvention of EU export restrictions against Russia – List of High Priority Battlefield Items

The EU and its international partners responded to Russia's war of aggression against Ukraine on 24 February 2022 with massive and comprehensive restrictive measures. The sectoral sanctions aim at curtailing Russia's ability to wage the war, depriving it of critical technologies and markets and significantly weakening its industrial base.

Regulation 833/2014 imposing sanctions against Russia has sharpened and includes prohibitions on the export, sale, transfer of dual-use goods and advanced technology items to target sensitive sectors in Russia's military industrial complex and to limit its access to crucial advanced technology.

The European Commission services, in coordination with the competent authorities in the US, the UK and Japan, have identified a number of prohibited dual-use goods and advanced technology items used in Russian military systems found on the battlefield in Ukraine or critical to the development, production or use of those Russian military systems. These items include electronic components such as integrated circuits and radio frequency transceiver modules, as well as items essential for the manufacturing and testing of the electronic components of the printed circuit boards retrieved from the battlefield.

These battlefield items have been grouped into a list of High-Priority Battlefield Items, which can be found in the Annex. The List may support due diligence and effective compliance by exporters and targeted anti-circumvention actions by customs and enforcement agencies of partner countries determined to prevent that their territories are being abused for circumvention of EU sanctions purposes.

The List of High Priority Battlefield Items is divided into four Tiers containing a total of 38 (Harmonised System codes) dual-use and advanced technology items sanctioned under the Russia Sanctions Regulation and involved in Russian weapons system used against Ukraine, including e.g. the Kalibr cruise missile, the Kh-101 cruise missile, the Orlan-10 UAV and the Ka-52 "Alligator" helicopter.

The list is divided into four Tiers:

- **Tier 1** comprises 4 HS codes which describe integrated circuits (also referred to as microelectronics).
- **Tier 2** comprises 5 HS codes containing electronics items related to wireless communications, satellite-based radio-navigation and passive electronic components.
- **Tier 3** comprises 19 HS codes containing discrete electronic components, electrical plugs and connectors, navigation equipment, digital cameras and related optical components.
- **Tier 4** includes 10 HS codes concerning manufacturing equipment for production and quality testing of electric components and circuits.

The List is not static and will be periodically adjusted in the light of what is found in Russian military systems on the battlefield and Russia's use of sanctioned sensitive items¹.

ANNEX – List of High Priority Battlefield Items

TIER 1

HS code (4)	Text
8542.31	Electronic integrated circuits: Processors and controllers, whether or not combined with memories, converters, logic circuits, amplifiers, clock and timing circuits, or other circuits
8542.32	Electronic integrated circuits: Memories
8542.33	Electronic integrated circuits: Amplifiers
8542.39	Electronic integrated circuits: Other

TIER 2

HS code (5)	Text
8517.62	Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus
8526.91	Radio navigational aid apparatus
8532.21	Other fixed capacitors: Tantalum capacitors
8532.24	Other fixed capacitors: Ceramic dielectric, multilayer
8548.00	Electrical parts of machinery or apparatus, not specified or included elsewhere in chapter 85

TIER 3

HS code (19)	Text
8471.50	Processing units other than those of subheading 8471 41 or 8471 49, whether or not containing in the same housing one or two of the following types of unit: storage units, input units, output units
8504.40	Static converters
8517.69	Other apparatus for the transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless network
8525.89	Other television cameras, digital cameras and video camera recorders
8536.69	Plugs and sockets for a voltage not exceeding 1 000 V
8536.90	Electrical apparatus for switching electrical circuits, or for making connections to or in electrical circuits, for a voltage not exceeding 1000 V (excluding....)
8541.10	Diodes, other than photosensitive or light-emitting diodes (LED)
8541.21	Transistors, other than photosensitive transistors with a dissipation rate of less than 1 W
8541.29	Other transistors, other than photosensitive transistors

¹This List does not represent the full list of the EU's trade sanctions against Russia. Please refer to Regulation (EU) 833/2014 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014R0833-20230427>) for the full set of restrictive measures.

8541.30	Thyristors, diacs and triacs (excl. photosensitive semiconductor devices)
8541.49	Photosensitive semiconductor devices (excl. Photovoltaic generators and cells)
8541.51	Other semiconductor devices: Semiconductor-based transducers
8541.59	Other semiconductor devices
8541.60	Mounted piezo-electric crystals
8807.30	Other parts of aeroplanes, helicopters or unmanned aircraft
9013.10	Telescopic sights for fitting to arms; periscopes; telescopes designed to form parts of machines, appliances, instruments or apparatus of this chapter or Section XVI
9013.80	Other optical devices, appliances and instruments
9014.20	Instruments and appliances for aeronautical or space navigation (other than compasses)
9014.80	other navigational instruments and appliances

TIER 4

HS code (10)	Text
8471.80	Units for automatic data-processing machines (excl. processing units, input or output units and storage units)
8486.10	Machines and apparatus for the manufacture of boules or wafers
8486.20	Machines and apparatus for the manufacture of semiconductor devices or of electronic integrated circuits
8486.40	Machines and apparatus specified in note 11(C) to this chapter
8534.00	Printed circuits
8543.20	Signal generators
9030.20	Oscilloscopes and oscillographs
9030.32	Multimeters with recording device
9030.39	Instruments and apparatus for measuring or checking voltage, current, resistance or electrical power, with recording device
9030.82	Instruments and apparatus for measuring or checking semiconductor wafers or devices



