

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