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UK TARGETED SANCTIONS: RUSSIA'S INVASION OF UKRAINE Explainer for Civil Society, March 2022

1. The UK is using targeted sanctions as a tool to address Russia's invasion of Ukraine. These sanctions impose travel bans and asset freezes and are being used against individuals and entities. The UK is taking this action alongside a number of other jurisdictions, including the US and the EU.

WHAT ARE THE RELEVANT SANCTIONS REGIMES?

There are several UK sanctions regimes that could apply to the Russian invasion of Ukraine.

[The Russia \(Sanctions\) \(EU Exit\) Regulations 2019](#) (as amended by the [Russia \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2022](#)) (the "Russia Regulations")¹

2. As of 2 March 2022, the UK had imposed all its targeted sanctions in response to the Russian invasion of Ukraine under the Russia Regulations.
3. These regulations allow the UK government to sanction state and non-state actors for their involvement in (i) destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, or (ii) obtaining a benefit from or supporting the Government of Russia. For more guidance, see Regulation 3 of the Russia (Sanctions) (EU Exit) (Amendment) Regulations 2022.

[The Global Anti-Corruption Sanctions Regulations 2021](#) (the "GACS Regulations")

4. Under the GACS Regulations, the UK government can sanction state and non-state actors for their involvement in bribery and/or misappropriation of state assets.
5. These regulations could be used by the UK government to sanction supporters of Putin's regime who are involved in corrupt practices and do not fall within the criteria for the Russia Regulations.

[The Global Human Rights Sanctions Regulations 2020](#) (the "GHRs Regulations")

6. Under the GHRs Regulations, the UK government can sanction state and non-state actors for their involvement in violations of (a) the right to life, (b) the right to be free from torture and other cruel, inhuman and degrading treatment, and (c) the right to be free from slavery.
7. These regulations could be used by the UK government to impose sanctions in response to human rights violations committed by Russian troops in Ukraine.

Other Sanctions Regimes

8. Other thematic regimes such as the [Chemical Weapons \(Sanctions\) \(EU Exit\) Regulations 2019](#) could apply in the event of specific actions by Russian forces in Ukraine.

WHAT CAN CIVIL SOCIETY DO?

9. Civil society organisations seeking to have individuals and/or entities sanctioned can file evidence submissions with the UK Foreign, Commonwealth & Development Office (the "FCDO").
10. The FCDO has published guidance notes for NGOs seeking to file submissions under the [GHRs Regulations](#) and the [GACS Regulations](#). While there is no such guidance note for the Russia Regulations, NGOs and other members of civil society can still file such submissions under that regime.
11. REDRESS has published a [template](#) for submissions to the FCDO. While this template is for those seeking designations under the GHRs Regulations, it can still be used for submissions under the Russia and GACS Regulations.
12. If you would like advice on the UK sanctions regimes and/or assistance with submissions to the FCDO please email Charlie Loudon, International Legal Adviser (charlie@redress.org) and Megan Smith, Legal Officer (megan@redress.org).

¹ The 2019 regulations and the 2022 amendment regulations must be read together.