

**Ministry for Foreign Affairs interpretation of Article 3i of Council Regulation (EU) No 833/2014:
Import of passenger cars having a Russian license plate into the EU**

The European Commission published a new guidance (FAQ) on 8 September 2023 on the interpretation of import of vehicles falling under CN code 8703 into the European Union. According to the guidance, it is Council Regulation (EU) No 833/2014 unequivocally prohibits the import of any vehicles registered in Russia and having a Russian license plate into the European Union even temporarily. The Commission updated its interpretation on 12 September 2023, emphasising that that vehicles are especially prone to sanctions circumvention and that the national competent authorities should pay attention to them.

Article 3i(1) of Council Regulation No 833/2014 states that it shall be prohibited to purchase, import, or transfer, directly or indirectly, goods which generate significant revenues for Russia thereby enabling its actions destabilising the situation in Ukraine, as listed in Annex XXI into the Union if they originate in Russia or are exported from Russia. Among the goods listed in Annex XXI are motor vehicles and cars falling under CN code 8703.

So far, Lithuania, Latvia and Estonia have already implemented the Commission's new interpretation concerning the prohibition of the import of vehicles. The Ministry for Foreign Affairs stresses the importance of having a common interpretation of the sanctions regulations among the EU Member States, and especially among the EU Member States sharing a border with Russia.

Based on the grounds above, the interpretation of the Ministry for Foreign Affairs is that the import ban in Article 3i of Council Regulation (EU) No 833/2014, in accordance with the European Commission's guidance, applies to all cars and motor vehicles (CN code 8703, below vehicles) in private or commercial use having a Russian license plate. This means that no vehicle having a Russian license plate may be imported into the EU as of 16 September 2023. However, the ban does not apply to vehicles of diplomatic missions, consular posts or international organisations enjoying immunities in accordance with international law or to vehicles of their staff. In addition, the ban does not apply to vehicles in the personal use of EU citizens, who have a permanent residence in Russia, and of their family members. The ban does not apply vehicles used to enter the country for humanitarian reasons.

This interpretation will enter into force on 16 September 2023 at 00.00. Vehicles having a Russian license plate that were brought into the territory of the EU before 16 September 2023 will not be subject to restrictive measures under Article 3i of Council Regulation No 833/2014, unless they are used to circumvent sanctions. Vehicles registered in Russia that are already in Finland must be removed from the country within six months by 16 March 2024, unless the above-mentioned exceptions apply to them.

The Ministry for Foreign Affairs is the national competent authority in Finland as listed in Annex I of Council Regulation No 833/2014. The interpretation of the Ministry for Foreign Affairs was prepared in cooperation with the Finnish Customs. The matter was discussed by the Ministerial Committee on EU Affairs on 15 September 2023. The interpretation will be revised as necessary.