

RIPE NCC Quarterly Sanctions Transparency Report (Q4 2023)

Author: RIPE NCC

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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.

If a member or End User does not cooperate with our checks, we treat them as though they are sanctioned. This is because we have no way to establish otherwise. We have decided to include these members and End Users in this report for transparency.

Sanctions Exemptions

In our previous report (Q3 2023), we noted that in May 2023 we had received confirmation from the Dutch authorities that Internet number resources fall within an exemption introduced in 2022 related to sanctions against Russia. In September 2023, we received a separate confirmation from the Dutch authorities with regards to a prohibition on engaging directly or indirectly with any transactions as they pertained to certain listed entities, that transactions that relate to Internet number resources fall within an exemption introduced in June of 2022 related to sanctions against Russia, which excludes “transactions related to the provision of electronic communication services, data center services, and the provision of services and equipment necessary for their operation”. Following this clarification, we have started restoring normal services to all members and End Users who fall under the scope of this exemption. This includes members and End Users under investigation as well as those marked non-cooperative.

It is important to note that the above mentioned exemptions only refer to the specific EU sanctions against Russia. Our regular sanctions procedure applies to members and End Users who do not fall within the scope of these exemptions.

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, one member had their non-cooperative status withdrawn and another was marked as non-cooperative.

Changes Since Last Quarter

Date	Action	Relation	Country	IPv4	IPv6	ASNs
23-Oct-2023	Non-cooperative status withdrawn	Member	RU	256	0	1
19-Jul-2023	Marked as non-cooperative	Member	IR	8,192	/32	1

Status on 23-Oct-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
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
7-Feb-2023	Marked as non-cooperative	Member	IR	9,216	0	1
7-Mar-2023	Marked as non-cooperative	Member	IR	1,024	/29	1
15-Mar-2023	Marked as non-cooperative	Member	IR	1,313,792	/32	1
19-Jul-2023	Marked as non-cooperative	Member	IR	8,192	/32	1
Total				1,581,056	3 x /32, 3 x /29	9

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 (FP). 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 1,218 potential cases requiring investigation.

Cases Under Investigation: Status of Cases

Date	Total alerts for investigation	Not yet started	Under investigation	Confirmed false positive, not applicable or exempt	Confirmed sanctioned and applicable to RIPE NCC services
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
31-Mar-2023	1,046	411	191	435	9
10-Jul-2023	1,205	456	151	596	2
11-Oct-2023	1,218	410	124	682	2

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
31-Mar-2023	464	577	5	1,046
10-Jul-2023	519	681	5	1,205
11-Oct-2023	543	670	5	1,218

Note: 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.