

RIPE NCC Quarterly Sanctions Transparency Report (Q3 2022)

Author: RIPE NCC
Document ID: ripe-783
Date: July 2022

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.

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, three End Users in Russia have been confirmed as subject to EU sanctions. Each of these End Users had only one ASN, however one decided to return theirs when it was confirmed that they were subject to sanctions. Ordinarily, this would mean that the two remaining End Users were added to the second table below. However, in this case the End Users are two members confirmed as sanctioned on 20 April (marked with an asterisk). Their Provider Independent ASNs were administered by a sponsoring LIR rather than being held in their own LIR account.

Changes Since Last Quarter

Date	Action	Relation	Country	IPv4	IPv6	ASNs
05-May-2022	Frozen	End User	RU	0	0	1
05-May-2022	Frozen	End User	RU	0	0	1
05-May-2022	Frozen*	End User	RU	0	0	1

* This resource was returned voluntarily on 30 May 2022

Status on 01 July 2022

Date	Action	Relation	Country	IPv4	IPv6	ASNs
01-Apr-2020	Frozen	Member	IR	17,408	/32	1
01-Apr-2020	Frozen	Member	SY	230,400	/29	1
20-Apr-2022	Frozen	Member*	RU	7,552	/32	6
20-Apr-2022	Frozen	Member*	RU	4,096	/32	13
Total				259,456	/29, /32, /32, /32	21

* Member also holds Internet resources as an End User

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. 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 843 potential cases requiring investigation. Of these 843 alerts, 323 were in response to Russia's war on Ukraine (95 members / 227 End Users).

Cases Under Investigation: Status of Cases

Date	Total alerts for investigation	Not yet started	Under investigation	Confirmed false positive or sanctions not applicable to RIPE NCC services	Confirmed sanctioned and applicable to RIPE NCC services
20-Apr-2022	766	362	173	227	4
01-Jul-2022	843	309	207	323	4

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

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. Apart from making an internal note, no further action is taken if we find a match with the OFAC sanctions list.

Due to concerns on the part of our banks, we are not able to invoice members in Iran and Syria for their fees. We will not close these members for non-payment, and we plan to invoice them retroactively for the full amount as soon as this is possible.