



Foreign, Commonwealth
& Development Office

Post-Legislative Scrutiny Memorandum: Sanctions and Anti-Money Laundering Act 2018

March 2024



Post-Legislative Scrutiny Memorandum: Sanctions and Anti- Money Laundering Act 2018

Presented to Parliament
by the Minister of State for Indo-Pacific
by Command of His Majesty

March 2024



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Abbreviations

The 2022 Act	The Economic Crime (Transparency And Enforcement) Act 2022
The 2023 Act	The Economic Crime and Corporate Transparency Act 2023
ATCSA	The Anti-terrorism, Crime and Security Act 2001
AML/CFT	Anti-money laundering and countering the financing of terrorism
DBT	Department for Business and Trade
DfT	Department for Transport
ECHR	European Convention on Human Rights
EU	European Union
FCDO	Foreign, Commonwealth and Development Office
FATF	Financial Action Task Force
HMRC	His Majesty's Revenue and Customs
IRTL	Independent Reviewer of Terrorism Legislation
the MLRs	The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (S.I. 2017/692)
OFSI	Office of Financial Sanctions Implementation
OTSI	Office of Trade Sanctions Implementation
PARBOs	Publicly accessible registers of beneficial ownership
SAMLA	The Sanctions and Anti-Money Laundering Act 2018
UN	United Nations

1. Introduction

This memorandum provides a summary and a preliminary assessment of the provisions and implementation of the Sanctions and Anti-Money Laundering Act 2018 (“SAML A”). This memorandum has been prepared by the Foreign, Commonwealth and Development Office (“FCDO”) and submitted to the Foreign Affairs Committee as part of the post-legislative scrutiny process set out in Cm. 7320: Post-legislative Scrutiny – The Government’s Approach¹.

The scope of this memorandum extends to the provisions of SAML A as a piece of overarching primary legislation and does not extend to the detail of specific UK sanctions and anti-money laundering regulations. However, a compendium of statutory instruments made pursuant to SAML A is provided in [Annex A](#), and a case study of the UK’s Russia sanctions regime is provided in [Chapter 10](#) to illustrate the role that SAML A plays in enabling the UK’s sanctions response to international crises.

Unless otherwise stated, statistics, facts and tables in this memorandum are accurate as of 31st December 2023, the three-year anniversary of the end of the Transition Period.

¹ [Cm. 7320: Post-legislative Scrutiny – The Government’s Approach](#)

2. Background and objectives of SAMLA

Sanctions are restrictive measures on areas such as trade, finance, immigration, aircraft and shipping that can be put in place to fulfil a range of foreign policy purposes, including in relation to maintaining peace and security, preventing terrorism, and promoting respect for human rights.

Sanctions are therefore a vital foreign policy tool that the government can use, as part of our wider foreign policy approach, to deter and disrupt threats and malign behaviour and to demonstrate our defence of international norms. Sanctions are often put in place in coordination with other states, including through the United Nations (“UN”).

Whilst a member of the European Union (“EU”), the UK adopted UN and EU sanctions primarily through EU law and implementing legislation was brought into effect under the European Communities Act 1972 and other relevant domestic powers. The UK also relied on the European Communities Act 1972 to transpose EU directives relating to money laundering and counter-terrorist financing.

The UK enacted SAMLA to provide new legal powers on the UK’s exit from the EU which would enable the UK to:

- continue to implement UN sanctions regimes;
- use sanctions to meet national security and foreign policy objectives;
- keep anti-money laundering and counter-terrorist financing measures up to date; and
- continue to align with international anti-money laundering standards².

A range of additional specific sanctions-focused objectives were identified by the government during the development and passage of SAMLA³. These included:

- ensuring that sanctions are tailored to the specific activities they aim to address;
- ensuring that sanctions can evolve in response to real-world developments and respond rapidly and flexibly in response to crises;
- providing transparent Parliamentary scrutiny of new sanctions regimes;
- ensuring effective compliance with, and enforcement of, sanctions;
- establishing a flexible system for licensing legitimate activity;
- establishing a robust framework for designated persons to challenge their sanctions listings;
- upholding the UK’s human rights obligations.

² These objectives were set out in the [Explanatory Notes for SAMLA](#).

³ These were set out in the [public consultation that preceded SAMLA](#), the [government response to the public consultation](#), [Parliamentary debate on SAMLA](#), and [House of Lords library briefing on SAMLA](#).

In addition to these objectives, the creation of a new domestic framework for UK sanctions would present an opportunity to consolidate and bring further clarity to the complex patchwork of UK and EU instruments that comprised the UK's sanctions legislative framework while the UK was a member of the EU.

SAMLA received Royal Assent on 23rd May 2018. The powers provided by SAMLA have since been used to make an extensive range of sanctions and anti-money laundering regulations which are listed in [Annex A](#) of this memorandum.

In 2022 and 2023, the UK's sanctions framework faced a significant test as it has been used to deliver a key part of the UK's foreign policy response to Russia's full-scale invasion of Ukraine. This is therefore an appropriate time to review and assess the implementation of SAMLA since its passage in 2018.

3. Part 1, Chapter 1: Power to make sanctions regulations

a) Background

Creating a new power for the government to make sanctions regulations was necessary to ensure that the UK could continue to give effect to its UN sanctions obligations and pursue its foreign policy objectives through sanctions without interruption following the UK's exit from the EU. Provision addressing this issue was therefore made in Chapter 1 of Part 1 of SAMLA.

b) Provisions

i. Power to make sanctions regulations

Section 1 enables an appropriate Minister to make regulations imposing sanctions. The Minister must consider it appropriate to do so to ensure compliance with a UN or other international obligation, or, in accordance with section 1(2), for one or more additional purposes. The inclusion of these additional purposes means the UK can create three types of sanctions regimes through SAMLA:

- UN-only regimes, implementing UN and other international obligations only;
- Autonomous regimes, implementing additional purpose(s) only; and
- Mixed UK/UN regimes, implementing both UN obligations and additional purpose(s).

When SAMLA was passed, section 2 required the Minister to determine, when making regulations to establish autonomous or mixed UK/UN regimes, that there are good reasons to pursue the relevant additional purpose(s) and that the imposition of sanctions is a reasonable course of action for those purpose(s). Section 2(4) also required the Minister to lay before Parliament a report setting out the reasons why, and how the purposes of the regulations aligned with purposes set out in section 1(2). Section 2 was removed from SAMLA in 2022 (see [section 3\(d\)\(i\)](#) of this memorandum).

ii. Types of sanction

Sections 3 to 8 and Schedule 1 set out the types of sanctions that the Minister can impose in sanctions regulations.

Section 3 provides for financial sanctions and sets out the types of financial sanctions that can be imposed, including:

- targeted asset freezes;
- restrictions on a wide variety of financial markets and services, and related activity;
- directions to cease all business.

Section 3A provides for director disqualification sanctions. Once implemented via secondary legislation, this will provide a power to render it unlawful for a designated person subject to this new measure to act as a director of a company or to directly or indirectly take part in the management, formation or promotion of a company. Section 3A was added to SAMLA in 2023 (see [section 3\(d\)\(v\)](#) of this memorandum).

Section 4 provides for immigration sanctions, commonly known as travel bans, and those who are subject to immigration sanctions are "excluded persons" within the meaning of section 8B of the Immigration Act 1971. That Act already provided for the mechanics of a travel ban, so there was no need to replicate this under SAMLA.

Section 5 provides for trade sanctions and links to Schedule 1 which sets out the types of trade sanctions that can be imposed and their effect, including controls on the:

- import, export, transfer, movement, making available and acquisition of goods and technology;
- provision and procurement of services related to goods and technology;
- provision and procurement of certain other non-financial services;
- involvement of UK people in these activities.

Schedule 1 also makes further provision about trade sanctions, including the definition of certain relevant terms.

Section 6 enables the Minister to make aircraft sanctions. This includes restrictions on the ownership, registration or movement of aircraft. This can include restrictions on movements to and from airports and the detention of aircraft.

Section 7 enables the Minister to make shipping sanctions. This includes restrictions on the ownership, registration or movement of ships. This can include restrictions on movements to and from ports and harbours and the detention of ships.

Section 8 enables Ministers to put in place other forms of sanctions not specifically mentioned in sections 3 to 7 but which are required in order to comply with UN obligations.

iii. Designation of persons and Specified ships

Sections 9 to 13 set out the designation powers.

Section 9 introduces the term "designated persons", meaning persons who are individually subjected to sanctions, and sets out that "persons" can refer in this context to individuals and entities.

Section 10 sets out that persons can be designated by name or by description and enables the Minister to set out in regulations how the designation powers are to be exercised.

Section 10 sets out that once a decision has been made to designate a person, or to vary or revoke a designation (see [section 4](#) of this memorandum), the Minister must without delay take such steps as are reasonably practicable to inform the person of their designation or of any variation or revocation of their designation. Section 10 also allows regulations to make provision for the steps that should be taken for the publication and notification of designations. Section 11 requires that this public notification must include a statement of reasons where a person has been designated by name.

Section 11 also sets out what is now known as the “standard procedure” for designations by name, according to which the Minister must have reasonable grounds to suspect that a person is an “involved person” as defined in section 11. When SAMLA was enacted, section 11 also required that the Minister considered that the designation of a person was appropriate, having regard to the purpose of the regulations and to the likely significant effects of the designation on that person. An additional urgent procedure for designation by name was introduced to section 11 in 2022 (see [section 3\(d\)\(ii\)](#) of this memorandum).

Similar processes and requirements for designations by description are set out in section 12 of SAMLA. Section 13 provides that persons can be also designated in reference to a UN list.

Section 14 enables the Minister to specify a ship that may be subject to trade and/or shipping sanctions when authorised to do so by regulations. The specification process is comparable to the designation process set out in sections 9 to 13.

iv. Contents of sanctions regulations: further provision

Section 15 provides that sanctions regulations can specify exceptions to any of the prohibitions or requirements they impose and can provide that specific prohibitions disapply under the authority of a licence issued by an appropriate Minister, which can be issued generally or to a category of persons.

Section 15 also enables regulations to provide that licences are issued generally or to a category of persons and makes further provision about the content, duration, variation, revocation, and suspension of licences.

Section 15 also enables regulations to authorise the Secretary of State to make a direction that the effect of a travel ban on a person’s immigration status does not apply. This enables persons to enter the UK in exceptional circumstances.

Section 16 intends to help the government ensure that sanctions work effectively by requiring people to report relevant information, by enabling the government to collect information, and by authorising the sharing of information.

Section 17 provides that sanctions regulations may make provision for the enforcement of the prohibitions or requirements they set out, including the powers and duties of those enforcing the regulations, the enforcement of the conditions and directions set out in licences, and the enforcement of directions made in respect of aircraft and shipping sanctions.

Section 17 also enables regulations to create criminal offences and to provide for sentences of up to 10 years imprisonment following conviction on indictment, and enables the application or specification of powers set out in other legislation for the purposes of enforcement, investigation, and civil monetary penalisation⁴.

Section 17A provides expressly that sanctions regulations may authorise the imposition of civil monetary penalties in relation to the contravention of prohibitions or requirements imposed by sanctions regulations. Section 17A was added to SAMLA in 2023 (see [section 3\(d\)\(iv\)](#) of this memorandum).

When SAMLA was passed, section 18 required that where sanctions regulations include criminal offences, a report identifying the offences and setting out the reasons for creating them and for setting any relevant terms of imprisonment must be laid before Parliament. Section 18 was removed from SAMLA in 2022 (see [section 3\(d\)\(iv\)](#) of this memorandum).

Section 19 and 20 provide that sanctions regulations can make provision for powers to stop and search ships and to seize goods (including technology) found on the ship and sets out a distinction between these powers depending on the nationality or location of the ship.

Section 21 refers to the territorial application of SAMLA. It confirms that prohibitions or requirements can be imposed on any person in the UK (including UK territorial waters) or on any UK person anywhere in the world. A UK person is defined as including either a UK national or a body, for example a company, which is incorporated or constituted in the UK.

Section 21 also allows the effect of sanctions on UK persons to be extended by Order in Council to bodies incorporated or constituted under the law of any of the Channel Islands, the Isle of Man, and any of the British Overseas Territories, as if they were UK persons.

⁴ The Customs and Excise Management Act 1979, The Serious Organised Crime and Police Act 2005, and The Policing and Crime Act 2017, respectively.

c) Implementation

i. Power to make sanctions regulations and Types of sanction

Chapter 1 and Schedule 1 of SAMLA entered into force on 22nd November 2018 in accordance with The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 1) Regulations 2018 (S.I. 2018/1213) (C. 85).

The UK has since established a wide range of thematic and geographic sanctions regimes through SAMLA (see [Table A](#) of this memorandum). These regimes include financial, immigration, trade, aircraft, shipping, and director disqualification sanctions.

This process began between the passage of SAMLA and the end of the Transition Period on the 31st December 2020, during which time the government used the powers provided by SAMLA to establish UK sanctions regimes for UN and former EU sanctions which, at 11pm (UK time) on the 31st December 2020, transitioned 1084 EU sanctions designations into UK law. The first new regime established under SAMLA was The Global Human Rights Sanctions Regulations 2020 (S.I. 2020/680), which came into force in July 2020.

While section 2 of SAMLA was in force, the government published a report under section 2(4) for every sanctions regime made for any of the additional purposes set out in section 1(2) of SAMLA.

A list of statutory instruments and statutory reports made under SAMLA can be found in [Annex A](#) of this memorandum.

ii. Designation of persons and Specified ships

All sanctions regulations that establish sanctions regimes under SAMLA have set out the process through which designations and (where relevant) specifications must be made. Accordingly, as of the 31st December 2023:

- 669 individuals and 193 entities were designated under UN-only regimes and 37 ships were specified under UN-only regimes (899 total);
- 2758 individuals and 625 entities were designated under autonomous regimes (3383 total); and
- 8 individuals were designated under mixed UK/UN regimes (8 total).

UK sanctions designations and specifications are carefully designed, are based on information from a range of sources, and are legally reviewed to ensure they are robust. Following a recommendation from Ministers to proceed to a final decision to designate or specify, such a decision can be taken by officials considering all relevant information under the Carltona principle, a common law principle whereby Ministerial powers are exercisable by officials of the appropriate department acting in the Minister's name.

All designations and specifications are set out in the UK Sanctions List⁵ which was first published on 6th July 2020⁶. The UK Sanctions List sets out which people, entities and ships are designated or specified under all sanctions regulations made under SAMLA with reasons. The sanctions list is updated every time a decision is made to make, vary or revoke a designation under SAMLA. It does not include those designated under other powers, for instance under the Anti-terrorism, Crime and Security Act 2001 (“ATCSA”).

Separately, the Office of Financial Sanctions Implementation (“OFSI”) maintain the Consolidated List of Asset Freeze Targets⁷, which contains details of all financial sanctions designations made under UK legislation (SAMLA and ATCSA). The consolidated list is updated every time a decision is made to make, vary or revoke a designation that is subject to financial sanctions, in line with the UK Sanctions List. Additionally, a financial sanctions notice is published on GOV.UK with exact details of the designation including any changes to existing listings.

The UK Sanctions List does not contain entities listed in Schedules 2 and 4 of the Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855), which are covered by sectoral measures, because the designation power has not been used in relation to these entities. As a result, OFSI continues to maintain a separate list of persons named in relation to financial and investment restrictions in those Regulations⁸.

iii. Contents of sanctions regulations: further provision

In accordance with sections 15 to 17, all sanctions regulations made under SAMLA have made provision for their enforcement, and where relevant have made provision for licensing, exceptions, criminal offences, and the production of information.

HM Treasury implements financial sanctions and the oil price cap through OFSI⁹. OFSI was established in March 2016, prior to the passage of SAMLA, and works to help ensure financial sanctions and the oil price cap are properly understood, implemented and enforced in the UK. To do this, it provides information and guidance to help people comply with any financial sanctions made pursuant to SAMLA, issues licences that allow activities that are prohibited under these financial sanctions, and detects and investigates suspected breaches of these financial sanctions and the oil price cap, taking action where necessary.

⁵ [The UK Sanctions List – GOV.UK](#)

⁶ EU designations are set out in EU regulations themselves and the EU publishes a consolidated list of all EU designations.

⁷ [Financial sanctions targets: list of all asset freeze targets – GOV.UK](#)

⁸ [Russia: list of persons named in relation to financial and investment restrictions – GOV.UK](#)

⁹ [OFSI website – GOV.UK](#)

OFSI has the power to impose monetary penalties for breaches of financial sanctions¹⁰ and to refer cases to law enforcement agencies for investigation and potential prosecution. Since the 1st January 2021, OFSI has levied nine civil monetary penalties with a total value of £20,764,544.28.

OFSI seeks in the first instance to promote compliance through guidance and engagement. Undertaking wide-ranging engagements and publishing guidance, OFSI raises awareness of financial sanctions and the oil price cap so that people and industry understand what they need to consider when complying with the regulations. Through warning letters, suggestions for compliance, and referring cases to the relevant regulator, OFSI promotes better practice and behavioural change, preventing future non-compliance by the individual, organisation, or company. OFSI can also publicise details of sanctions breaches even where a monetary penalty has not been issued.

Details on the general licences issued¹¹ and enforcement actions undertaken by OFSI are provided on their website¹². OFSI also publishes annual licensing statistics through its Annual Reviews¹³, which contain sections on its compliance and enforcement, licensing and engagement activities.

The Home Office implements and enforces immigration sanctions through the powers provided by the Immigration Act 1971. Subject to the UK's obligations under the European Convention on Human Rights ("ECHR") and the 1951 Refugee Convention, persons who are the subject of an immigration sanction are refused leave to enter or remain in the UK. Any leave that they hold is cancelled and any exemption from immigration control no longer applies. A request for a direction can be made via the visa application process.

The Department for Business and Trade ("DBT") implements trade sanctions. DBT's Export Control Joint Unit and Import Controls Team are responsible for receiving, assessing, and granting or refusing licence applications for trade sanctions measures and for issuing general licences for trade sanctions. DBT publishes data pertaining to licensing decisions on the government website¹⁴.

The Office for Trade Sanctions Implementation ("OTSI"), which was announced on 11th December 2023, is currently being established and becomes fully operational in

¹⁰ The Policing and Crime Act 2017 contains powers for HM Treasury to impose monetary penalties for breaches of financial sanctions. SAMLA amended The Policing and Crime Act 2017 to ensure that the majority of provisions in regulations made under SAMLA fall within The Policing and Crime Act 2017's definition of "Financial sanctions legislation", which in turn ensures that where there has been a breach of those provisions a monetary penalty under The Policing and Crime Act 2017 can be applied.

¹¹ [OFSI General Licences – GOV.UK](#)

¹² [Enforcement of financial sanctions – GOV.UK](#)

¹³ [OFSI Annual Reviews – GOV.UK](#)

¹⁴ [Strategic export controls: licensing statistics: 1 January to 31 March 2023 – GOV.UK](#)

2024 once its new legal powers are in force. It will be responsible for enforcing certain trade sanctions by investigating potential breaches and issuing civil monetary penalties.

HM Revenue and Customs (“HMRC”) is responsible for enforcing certain licensing restrictions and has enforcement responsibility for trade sanctions offences that fall within its remit as the UK customs authority. HMRC also have a limited criminal enforcement role for trade sanctions for which other government departments, such as DBT, have policy and civil enforcement responsibility.

HMRC undertakes a preliminary assessment into all credible intelligence and allegations of trade sanctions offences. HMRC collaborates with other government departments and has a range of enforcement options available such as education, warning letters, issuing compound settlements, seizures and disruptions, and, in the most serious cases, referral to the prosecuting authorities.

For sanctions and export control offences, since the end of the Transition Period HMRC has imposed 43 financial settlements with a total value of over £9.4 million¹⁵. HMRC reports regularly on enforcement outcomes to Parliament’s Committees on Arms Exports Controls¹⁶.

The Department for Transport (“DfT”) implements and enforces transport sanctions and issues the associated licences and drafts relevant guidance. The enforcement of sanctions in the aviation and maritime sectors is supported by the Civil Aviation Authority, the Maritime and Coastguard Agency, the National Air Traffic Services, as well as harbours and airport operators.

Since the end of the Transition Period, DfT has issued four detention directions (one maritime and three aviation), and one general direction prohibiting British cruise ships from entering ports in Crimea. DfT also issued two directions under the Belarus regulations which have since been revoked.

While section 18 of SAMLA was in force, the government made a report under section 18 for every set of sanctions regulations that established criminal offences, identifying the offences and setting out the reasons for creating them and for setting any relevant maximum financial and custodial penalties. These reports are identified in [Annex A](#) of this memorandum.

No Orders in Council have been made under section 21 of SAMLA to extend the effect of sanctions on UK persons to bodies incorporated or constituted under the law of any of the Channel Islands, the Isle of Man, and any of the British Overseas

¹⁵ This figure covers Compound Settlement fines issued under the Customs and Excise Management Act 1979 in respect of offences linked to SAMLA and the Export Control Order 2008. Compound Settlement fines are published as [Notices to exporters – GOV.UK](#).

¹⁶ [Committees on Arms Export Controls - UK Parliament](#)

Territories, as if they were UK persons. However, regulations have been made under section 63 of SAMLA to extend UK sanctions regulations to the British Overseas Territories and the Isle of Man (see [section 9](#) and [Annex A](#) of this memorandum).

d) Legal Matters and Amendments

The Economic Crime (Transparency And Enforcement) Act 2022 (“the 2022 Act”) received Royal Assent on 14th March 2022 and contained a number of amendments to SAMLA aimed at streamlining some of its processes, including the processes for making sanctions regulations (see [section 3\(d\)\(i\)](#) and [section 7\(d\)\(i\)](#) of this memorandum), designation (see [section 3\(d\)\(ii\)](#)), reporting (see [section 3\(d\)\(i\)](#), [section 3\(d\)\(iv\)](#), [section 4\(d\)\(i\)](#), and [section 9\(d\)](#)) and review (see [section 4\(d\)\(i\)](#)).

The primary objective of these collective changes was to allow the government to act more swiftly and flexibly in concert with its allies. They enable the government to use sanctions more nimbly as a tool to navigate and respond to a contested and volatile world.

i. Amendments relating to the purposes of sanctions regulations

Section 57 of the 2022 Act omitted section 2 of SAMLA. This removed the requirement for the Minister to determine, when deciding that it is appropriate to make regulations to establish autonomous or mixed UK/UN regimes, that there are good reasons to pursue the relevant additional purpose(s) and that the imposition of sanctions is a reasonable course of action for those purpose(s).

The omission of section 2 of SAMLA also removed the requirement on the Minister under section 2(4) to accompany any regulations made for any of the additional purposes set out in section 1(2) of SAMLA with a report setting out why there were good reasons to pursue those additional purposes and why the imposition of sanctions was a reasonable course of action for that purpose.

Parliament retains the opportunity to scrutinise new sanctions regulations through the Parliamentary processes assigned in section 55 of SAMLA.

ii. Amendments relating to the designations process

Section 58 of the 2022 Act amended section 11 of SAMLA to establish an additional “urgent procedure” for designating persons by name. Under this urgent procedure, the Minister may designate a person who has been designated under corresponding provision of the law of the USA, the EU, Australia or Canada, or any other country specified in regulations made by the Minister, even if the Minister does not necessarily consider that there are reasonable grounds to suspect that the person is an “involved person”.

Subject to the following qualification, the designation ceases to have effect after fifty-six days. For the designation to remain in place after the fifty-six-day period (subject to extension for a further fifty-six days where specific conditions are met), the Minister must certify that he or she has reasonable grounds to suspect that the designated person is an involved person.

A similar urgent procedure for designations by description was also added by section 59 of the 2022 Act, amending section 12 of SAMLA.

The 2022 Act also amended the conditions according to which the Minister can make designations. Section 58 of the 2022 Act removed the requirement for the Minister to have regard to the likely significant effects of designation on the person when considering whether a designation by name is appropriate, and section 59 omitted the condition that designations by description made under the standard procedure may only be used where it is not practicable for the Minister to identify by name all the persons falling within the description.

iii. Judicial consideration of the designations process

In recent court challenges against designations (termed “Court Reviews” – see [section 6](#) of this memorandum), the judgments made have considered the legality of the approach taken by the government to making designations.

In Synesis (see [section 6\(c\)\(ii\)](#) of this memorandum), the judge confirmed that in order to establish whether there are reasonable grounds to suspect that a designated person has met the designation criteria, “the decision-maker must consider all the material or information known to him or ought to have been within his knowledge following reasonable inquiry. ... [T]hat “material” or “information” is not limited to evidence that would be admitted in a court of law. The net goes far wider ... although the Court will normally expect that at least some recognition has been given to its inherent quality.” The overall decision that there are “reasonable grounds to suspect” must still be rational.

In Shvidler (see [section 6\(c\)\(v\)](#) of this memorandum), the court took the view that, in respect of whether a fair balance has been struck between the rights of the designated person and the interests of the community, the effectiveness of the sanctions regime depends not on the effect of a particular measure directed at a single designated person but on the cumulative effect of all the measures imposed under that regime.

iv. Amendments relating to enforcement

Section 16 of SAMLA was amended by section 65 of the 2022 Act to allow the government to extend specific information powers in sanctions regulations to ensure that other government departments, agencies and relevant bodies are authorised to share information proactively with each other.

Section 17 of SAMLA was amended by The Criminal Justice Act 2003 (Commencement No. 33) and Sentencing Act 2020 (Commencement No. 2) Regulations 2022 (S.I. 2022/500) (C.18) and The Judicial Review and Courts Act 2022 (Magistrates' Court Sentencing Powers) Regulations 2023 (S.I. 2023/149) to reflect changes made by The Sentencing Act 2020 to the maximum penalty that a Magistrates' Court may impose¹⁷.

Section 17A was added to SAMLA by section 214 of the Economic Crime and Corporate Transparency Act 2023 ("the 2023 Act") to amend the existing enforcement powers provided in section 17 of SAMLA. For the avoidance of any doubt, and without prejudice to the generality of the powers conferred by that section, section 17A provides expressly that sanctions regulations may authorise the imposition of civil monetary penalties in relation to the contravention of prohibitions or requirements imposed by sanctions regulations. The precise arrangements for civil monetary penalties under SAMLA may be set out in secondary legislation. Section 17 of SAMLA was also amended by section 214 of the 2023 Act to ensure consistency with the addition of section 17A.

The requirement set out in section 18 of SAMLA for the Minister to produce a report on new criminal offences was omitted by section 63 of the 2022 Act.

v. Amendments relating to director disqualification sanctions

Section 3A was added to SAMLA by section 35 of the 2023 Act to provide for director disqualification sanctions. Once implemented via secondary legislation, it will be unlawful for a designated person subject to this new measure to act as a director of a company or to directly or indirectly take part in the management, formation or promotion of a company. Sections 1, 9 and 15 of SAMLA were also amended by section 35 of the 2023 Act to ensure consistency with the addition of section 3A.

e) Existing Reviews

Several reviews have considered the government's use of specific powers set out in Chapter 1 of SAMLA. These reports were issued pursuant to sections 30, 31, and 32 of SAMLA and more information is therefore provided in [section 4\(c\)\(ii\)](#) of this memorandum. Separately, OFSI publishes an annual review which contains sections on its compliance and enforcement, licensing and engagement activities¹⁸.

f) Preliminary Assessment

The power provided by Chapter 1 of Part 1 of SAMLA to make sanctions regulations and designations successfully ensured that following the UK's exit from the EU there

¹⁷ The 2022 Act also amended sections 146-147 and 149 of The Policing and Crime Act 2017 in connection with the imposition of monetary penalties for breaches of financial sanctions.

¹⁸ [OFSI Annual Reviews – GOV.UK](#)

was no disruption to the UK's compliance with its UN sanctions obligations and no disruption to the UK's commitment to working effectively with European and international partners to tackle shared foreign policy challenges.

These objectives have also been fulfilled in the three years since the end of the Transition Period, during which the UK has used the powers provided by SAMLA to establish and update its own autonomous sanctions regimes and to continue to give effect to its UN sanctions obligations.

The government's ability and willingness to use these powers effectively is evidenced in the extensive range of statutory instruments that have been made since the passage of SAMLA (see [Annex A](#) of this memorandum), and the requirement to make sanctions through secondary legislation has fulfilled the government's objective of ensuring transparent Parliamentary scrutiny of new sanctions regimes.

The list of additional purposes set out in section 1(2) of SAMLA is clear and comprehensible and has given the government sufficient flexibility to tailor and use sanctions in a broad range of specific foreign policy contexts.

Furthermore, SAMLA has brought significant clarity and definition to the UK's sanctions activity and architecture. Sections 3 to 7, 17, and Schedule 1 have provided a robust legislative foundation upon which administrative and enforcement structures have been established to ensure the enforcement of and compliance with sanctions. Meanwhile, section 8 futureproofs SAMLA against the development of new types of sanctions agreed by the UN Security Council.

In the immediate period following Russia's full-scale invasion of Ukraine in February 2022, it became clear that there were some limitations to how quickly sanctions could be made under SAMLA, and that some international partners were initially able to move faster than the UK to impose sanctions on Russia. Amendments to sections 2, 11 and 12 of SAMLA in the 2022 Act enable the UK to respond more quickly and flexibly alongside our allies to periods of intense international crisis in an increasingly contested and volatile world.

At the same time, the requirement for the Minister to consider that the making of sanctions regulations and designations is appropriate ensures that our sanctions activity remains purposeful, rational, and proportionate, and that sanctions are only imposed where justified and consistent with the objectives of our sanctions regimes.

Furthermore, the power to make provision for licensing legitimate activity and exceptions is a key part of managing the impacts of sanctions, including on UK businesses, charities and individuals and mitigating any unintended consequences of sanctions.

The effectiveness and utility of the powers provided in Part 1 Chapter 1 of SAMLA are further demonstrated through the Russia case study (see [section 10](#) of this memorandum).

Table A: Sanctions Regimes legislated for under SAMLA

Regime	Scope	Category	Types of sanction
Chemical Weapons	Thematic	Autonomous	Financial and immigration
Domestic Counter-Terrorism	Thematic	Mixed UK/UN	Financial
Cyber Activity	Thematic	Autonomous	Financial and immigration
Global Anti-Corruption ¹⁹	Thematic	Autonomous	Financial and immigration
Global Human Rights	Thematic	Autonomous	Financial and immigration
International Counter-Terrorism	Thematic	Mixed UK/UN	Financial, immigration and trade
ISIL (Da'esh) and Al-Qaida	Thematic	UN-only	Financial and trade ²⁰
Unauthorised drilling activities in the Eastern Mediterranean	Thematic	Autonomous	Financial and immigration
Afghanistan	Geographic	UN-only	Financial and trade ²⁰
Republic of Belarus	Geographic	Autonomous	Financial, immigration, trade, aircraft and shipping
Bosnia and Herzegovina	Geographic	Autonomous	Financial and immigration
Burundi	Geographic	Autonomous	Financial and immigration
Central African Republic	Geographic	Mixed UK/UN	Financial, immigration ²¹ and trade
Democratic People's Republic of Korea	Geographic	Mixed UK/UN	Financial, immigration ²¹ , trade, aircraft and shipping
Democratic Republic of the Congo	Geographic	Mixed UK/UN	Financial, immigration ²¹ and trade
Guinea	Geographic	Autonomous	Financial and immigration
Republic of Guinea-Bissau	Geographic	Autonomous	Financial and immigration ²¹
Haiti	Geographic	UN-only	Financial and trade ²⁰

¹⁹ Revoked the Misappropriation regime (see [section \(a\)\(iv\) of Annex A](#) this memorandum).

²⁰ These regulations do not impose immigration sanctions. Individuals designated by the relevant UN Security Council Resolution(s) are already excluded persons for the purposes of Section 8B of the Immigration Act 1971.

²¹ These regulations do not impose separate immigration sanctions on individuals designated by the relevant UN Security Council Resolution(s). Such persons are already excluded persons for the purposes of Section 8B of the Immigration Act 1971.

Iran	Geographic	Autonomous	Financial, immigration, trade and shipping ²²
Iran (nuclear)	Geographic	Mixed UK/UN	Financial, immigration and trade
Iraq	Geographic	UN-only	Financial and trade
Lebanon	Geographic	UN-only	Trade
Lebanon (assassination of Rafiq Hariri and others)	Geographic	UN-only	Financial ²³
Libya	Geographic	Mixed UK/UN	Financial, immigration ²⁴ , trade, aircraft and shipping
Mali	Geographic	Autonomous	Financial and immigration ²⁵
Myanmar ²⁶	Geographic	Autonomous	Financial, immigration and trade
Nicaragua	Geographic	Autonomous	Financial and immigration
Russia	Geographic	Autonomous	Financial, immigration, trade, aircraft and shipping
Somalia	Geographic	Mixed UK/UN	Financial, immigration ²⁴ and trade
South Sudan	Geographic	Mixed UK/UN	Financial, immigration ²⁴ and trade
Sudan	Geographic	Mixed UK/UN	Financial, immigration ²⁴ and trade
Syria	Geographic	Autonomous	Financial, immigration, trade and aircraft
Syria cultural property	Geographic	UN-only	Trade
Venezuela	Geographic	Autonomous	Financial, immigration and trade
Yemen	Geographic	Mixed UK/UN	Financial, immigration ²⁴ and trade
Zimbabwe	Geographic	Autonomous	Financial, immigration and trade

²² Revoked the Iran (human rights) regime (see [section \(b\)\(xi\) of Annex A](#)). The Iran regime also includes a Director Disqualification sanctions measure.

²³ These regulations do not impose immigration sanctions. Individuals designated by the relevant UN Security Council Resolution(s) are already excluded persons for the purposes of Section 8B of the Immigration Act 1971.

²⁴ These regulations do not impose separate immigration sanctions on individuals designated by the relevant UN Security Council Resolution(s). Such persons are already excluded persons for the purposes of Section 8B of the Immigration Act 1971.

²⁵ The UN's Mali regime ended on the 30th August 2023 and UK legislation will be updated in 2024 accordingly.

²⁶ Revoked the Burma regime (see [section \(b\)\(xviii\) of Annex A](#) of this memorandum).

4. Part 1, Chapter 2: Review by appropriate Minister, and other reviews

a) Background

Chapter 2 of SAMLA concerns the review, revocation and variation of sanctions designations, and establishes a framework for designated persons to challenge their sanctions listings.

b) Provisions

i. Revocation, variation and review of designations

Section 22 enables the Minister who made a designation for autonomous purpose(s) to revoke or vary the designation at their discretion. Section 22 requires Ministers to use the power to revoke a designation where the required conditions of the relevant designation power are not met in respect of the designation.

Section 23 enables persons designated for autonomous purpose(s) to request that the government revoke or vary their designation and requires the Minister to consider the request. Section 23 allows the Minister to vary or revoke the designation or to take no action with respect to the designation after considering a request. When SAMLA was passed, section 24 also required the government to reconsider every designation no less regularly than every three years. Section 24 was removed in 2022 (see [section 4\(d\)\(i\)](#) of this memorandum).

Section 25 enables persons who have been designated in order to comply with a UN designation to request that the Secretary of State uses their best endeavours to persuade the UN to remove them from the relevant UN instrument. The Secretary of State must decide whether or not to comply with this request.

To guard against repetitious requests, both sections 23 and 25 provide that once a request has been considered, no further requests may be made by the same person unless that person can show that there is a significant matter which the Secretary of State had not previously considered.

ii. Revocation and review in relation to ships

Sections 26 to 29 make similar provision to sections 22 to 25 in relation to the revocation and review of ship specifications. Section 28 was removed in 2022 (see [section 4\(d\)\(i\)](#) of this memorandum).

iii. Review of regulations

As originally enacted, section 30 of SAMLA required the government to consider on an annual basis whether sanctions regulations were still appropriate for their

specified purposes, including, for sanctions regulations which were made for an additional purpose(s), whether there were good reasons to pursue the purpose(s) and whether sanctions were a reasonable course of action for the purpose(s). The Minister was required to lay before Parliament a report outlining the conclusions of the review. Section 30 was removed in 2022 (see [section 4\(d\)\(i\)](#) of this memorandum).

Section 31 requires an independent reviewer to conduct reviews of sanctions regulations which impose asset freezes or similar financial sanctions where the regulations are made for purposes relating to the prevention of terrorism and they have been referred to the independent reviewer by the Secretary of State or the Treasury for review. This replicated the role of the independent reviewer appointed under Part 1 of the Terrorist Asset Freezing etc. Act 2010, which SAMLA repealed.

Upon the passage of SAMLA, section 32 required the government to make annual reports about the use of the power to make sanctions regulations, which were required to identify regulations made for the purpose of providing accountability for or being a deterrent to gross human rights violations and to specify any recommendations made by a Parliamentary Committee for the use of that power in relation to such violations, including any government response. Section 32 was removed in 2022 (see [section 4\(d\)\(i\)](#) of this memorandum).

iv. Procedure for requests to, and reviews by, appropriate Minister

Section 33 allows Ministers to set out through regulations the procedures applying to the review and reassessment mechanisms in SAMLA and sets out that regulations must require Ministers to consider requests under sections 23, 25, 27 and 29 as soon as reasonably practicable after receipt of the information needed to make the decision.

c) Implementation

On 23rd May 2018, section 32 of SAMLA entered into force in accordance with section 64 of SAMLA. On 22nd November 2018, sections 22 to 31 and section 33 of SAMLA entered into force in accordance with The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 1) Regulations 2018 (S.I. 2018/1213) (C. 85).

i. Revocation, variation and review of designations and Revocation and review in relation to ships

On 27th November 2018, The Sanctions Review Procedure (EU Exit) Regulations 2018 (S.I. 2018/1269) were made to set out the procedure for requesting a review of sanctions designations and ship specifications under SAMLA.

During the Transition Period, the government then published:

- In July 2020, guidance on how designated persons can request a review of a designation²⁷ and a Sanctions Review Request Form for designated persons, UN-listed persons, or persons acting on their behalf to request a review of their designation under UK sanctions or a UN listing²⁸;
- In December 2020, similar guidance²⁹ and a similar Sanctions Review Request Form pertaining to the specification of ships³⁰.

Currently, the high-level process for considering requests for review under sections 22 to 29 of SAMLA is as follows:

- When the government receives a completed Sanctions Review Request Form via the contact details set out in The Sanctions Review Procedure (EU Exit) Regulations 2018 (S.I. 2018/1269), it does an initial check to confirm that the request conforms with the published guidance;
- If a request is missing essential information or does not conform with the guidance, the government will notify the requester and may request further information;
- As soon as reasonably practicable after receiving the information needed for making a decision, the government reviews the evidence provided with the request as well as the case as a whole, and the Minister will make a decision on the request;
- The government then notifies the requester of the outcome and the reasons for it in writing as soon as reasonably practicable after the decision is made. Matters may however be excluded from the reasons given where the FCDO consider that it is in the interests of national security, international relations, justice or for reasons connected with the prevention or detection of serious crime in the UK or elsewhere;
- If a request for review has already been made regarding a designated person, a UN-listed person, a specified ship, or a ship specified for any purposes by a UN Security Council resolution, and that request was refused, no further related request may be made in relation to that designation or specification. The exception is if there is a significant matter which was not previously considered, such as new significant evidence;
- If the requester does not agree with the decision in regard to their request, the requester may apply for a Court Review of the decision via the UK courts (see [section 6](#) of this memorandum).

²⁷ [How to request variation or revocation of a sanctions designation or review of a UN listing – GOV.UK](#)

²⁸ [Sanctions Review Request Form: designated persons and UN listed persons – GOV.UK](#)

²⁹ [How to request a review of the designation or specification of a ship – GOV.UK](#)

³⁰ [Sanctions Review Request Form: designated ships and specified ships – GOV.UK](#)

The number of requests processed since the passage of SAMLA are set out in Table B.

Table B: Administrative Reviews

Total	Designations	Specifications
Total cases to date ³¹	45	0
Total completed	28	0
Total revoked	9	0
Total upheld	19	0
Total outstanding	17	0

ii. Review of regulations

The government presented its first annual report prepared under section 30 of SAMLA to Parliament in November 2020 when most regimes were not yet in force.

In January 2022, the government published its second annual report in accordance with section 30 of SAMLA³², summarising an annual review of the appropriateness of each sanctions regime and whether or not they were contributing to their intended purposes. The report indicated that all but one of the 33 reviewed regimes remained appropriate for their purposes, and that those regimes should be maintained³³.

In January 2021, the Independent Reviewer of Terrorism Legislation (“IRTL”) was appointed to review the operation of asset freeze provisions within the Counter Terrorism (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/577) in accordance with section 31 of SAMLA. In December 2022, the IRTL’s first report on the operation of the 2019 Regulations was laid before Parliament³⁴.

While the focus of this report was the 2019 Regulations, the IRTL also considered SAMLA itself in some detail in this report. The IRTL described SAMLA as “a technically coherent framework for international and autonomous sanctions” which “contrasts favourably with the earlier patchwork of instruments and reliance on EU law”³⁵. The IRTL’s second report on the operation of the 2019 Regulations was published in December 2023³⁶.

The IRTL’s first and second report also provided commentary on specific provisions of Chapter 2 of SAMLA (see [section 4\(e\)](#) of this memorandum).

³¹ Of which, designations by regime: Russia (31), Belarus (4), Libya (3), Syria (3), Myanmar (2), Global Anti-Corruption (1), Global Human Rights (1).

³² [Sanctions Regulations Report on Annual Reviews 2021 – GOV.UK](#)

³³ Due to developments in Burundi, the government concluded that one of the four purposes of the Burundi regime was no longer appropriate.

³⁴ [Report of the IRTL, 2022](#) (including the government’s response)

³⁵ [Report of the IRTL, 2022](#) (paragraph 3.1)

³⁶ [Report of the IRTL, 2023](#) (including the government’s response)

In accordance with section 32 of SAMLA, the government reported in 2019³⁷, 2020³⁸ and 2021³⁹ on sanctions regulations aimed at dealing with gross violations of human rights and provided information on additional actions the government had taken related to human rights sanctions.

d) Legal Matters and Amendments

i. Amendments relating to statutory review mechanisms

Section 22 of SAMLA was amended by sections 58 and 59 of the 2022 Act to ensure consistency with the new urgent designation procedures introduced by the 2022 Act (see [section 3\(d\)\(ii\)](#) of this memorandum). Sections 24, 28 and 30 of SAMLA were omitted by section 62 of the 2022 Act, and section 32 of SAMLA was omitted by section 63 of the 2022 Act, to reduce the burden of specific reporting requirements to free up vital resource to focus on developing new sanctions.

Section 33 of SAMLA was also amended by section 62 of the 2022 Act to ensure consistency with the omission of sections 24, 28 and 30.

ii. Judicial consideration of statutory review mechanisms

In Youssef (see [section 6\(c\)\(i\)](#) of this memorandum), the High Court ruled that SAMLA's provisions for the review of UN listings under section 25 (and court reviews under section 38) are an effective remedy and compatible with the ECHR.

e) Existing Reviews

The IRTL's first report on the Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/577) noted the removal by the 2022 Act of the triennial duty to review individual designations and ship specifications that had previously been set out in section 24 of SAMLA, and noted a risk of "an ossified list containing out of date designations"⁴⁰.

The IRTL also noted that the "cornerstone duty"⁴¹ on Ministers under section 22 of SAMLA to revoke a designation where the required conditions are not met remains in place, and that "whilst this falls short of requiring perpetual active review, it constitutes something of a 'watching brief'"⁴². The IRTL also noted that at the time of the 2022 Act, the government recognised that "it is important that designations are kept under review". Furthermore, the IRTL noted that designated individuals have the right to request a ministerial review at any time, even though in practice they may "lack the opportunity to do so"⁴³.

³⁷ [Written Ministerial Statement, June 2019](#)

³⁸ [Written Ministerial Statement, July 2020](#)

³⁹ [Written Ministerial Statement, July 2021](#)

⁴⁰ [Report of the IRTL, 2022](#) (paragraph 3.50)

⁴¹ [Report of the IRTL, 2022](#) (paragraph 3.50)

⁴² [Report of the IRTL, 2022](#) (paragraph 3.52)

⁴³ [Report of the IRTL, 2022](#) (paragraph 3.54)

The IRTL also noted the absence of a specific timeframe for the Minister to decide whether to vary or revoke non-UN designations upon request by a designated person and suggested that SAMLA's requirement for the Minister to make a decision "as soon as reasonably practicable" contrasts "unfavourably" with the 90-day limit for the process of applications to de-proscribe organisations that have been banned under the Terrorism Act 2000⁴⁴.

In his second report on the 2019 Regulations, published in December 2023, the IRTL assessed that the triennial reviews of designations made under the 2019 Regulations had been conducted "to a highly professional standard"⁴⁵, and that the removal of the obligation to conduct triennial reviews had "little if any impact" in the context of a counter-terrorism sanctions regime⁴⁶.

f) Preliminary Assessment

Chapter 2 of SAMLA established fundamental safeguards that continue to ensure that designations made under the UK's sanctions framework remain relevant and appropriate.

The 2022 Act streamlined the sanctions processes that SAMLA first established, initially enabling the government to focus its sanctions efforts on responding to Russia's full-scale invasion of Ukraine, and this continues to enable the government to use sanctions swiftly and flexibly in a more contested and volatile world.

Fundamental statutory safeguards in SAMLA remain in place. Ministers continue to be under a duty to revoke a designation where the relevant tests are no longer met, and designated persons continue to have the opportunity to request that their designation be reviewed through an administrative review (and for the outcome of that review to be considered by the courts – see [section 6](#) of this memorandum). Any such requests continue to be considered by the government as soon as reasonably practicable. The government's commitment to these principles is evidenced in the number of requests that the government has considered since the passage of SAMLA.

As such, Chapter 2 has contributed to the UK government's objectives to establish a robust, transparent, and fair framework for designated persons to challenge their sanctions listings and to ensure that sanctions are tailored to the specific activities they aim to address.

⁴⁴ [Report of the IRTL, 2022](#) (paragraph 3.58)

⁴⁵ [Report of the IRTL, 2023](#) (paragraph 5.1)

⁴⁶ [Report of the IRTL, 2023](#) (paragraph 5.2)

5. Part 1, Chapter 3: Temporary powers in relation to EU sanctions lists

a) Background

The objective of Chapter 3 was to ensure that retained EU sanctions regimes could be updated for a short period after the UK's exit from the EU until they were replaced by UK regimes. The powers provided in this section were temporary, lasting for two years, and were inserted into the Bill as a continuity safeguard at a time when the exact timing of the UK's exit from the EU was unclear and it was not clear how long it would take to transition EU sanctions regimes into UK law.

b) Provisions

Section 34 enabled certain changes to be made to any EU sanctions regimes that were retained by the EU (Withdrawal) Act 2018 and were not replaced by a UK sanctions regime through SAMLA. Under section 34, Ministers could add or remove names from lists of persons who were designated by virtue of their inclusion in an EU sanctions list.

Section 35 then set out the conditions for adding a person's name to an EU sanctions list, except UN-named persons. Section 35 reflected the conditions for the designation of persons under sections 11 and 12 but required the Minister to have regard to the purposes of the EU legislation rather than to have regard to the provisions in UK regulations.

Section 36 enabled persons who were designated under a retained EU sanctions list to make a request to be removed from that list, which was required to be granted where the appropriate Minister did not have reasonable grounds to suspect the designated person is an "involved person" or did not consider it appropriate for the person to be designated. The decision was required to be made as soon as reasonably practicable after the appropriate Minister received the necessary information to make the decision, and the person who made the request was required to be informed as soon as reasonably practicable after the decision was made.

Section 37 ensured that where a person was on a retained EU sanctions list by virtue of a UN Security Council Resolution, they could only make a request to the appropriate Minister to use best endeavours to remove their name from the relevant UN list.

c) Implementation

Sections 34 to 37 entered into force on 22nd November 2018 in accordance with The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 1) Regulations 2018 (S.I. 2018/1213) (C. 85). These provisions expired after two years without being used, as all UK equivalents of all relevant EU sanctions regimes were established in UK law under SAMLA by the end of the Transition Period.

d) Legal Matters and Amendments

There have been no amendments to sections 34 to 37 and no legal issues have been identified.

e) Existing Reviews

As these powers were never required to be used, there are no notable reviews to include.

f) Preliminary Assessment

As these powers were never required to be used, it is not necessary to assess them. However, the fact that these powers were provided as a continuity safeguard and ultimately not required further evidences the government's commitment during the Transition Period to ensuring that the UK could continue to comply with our obligations under the UN Charter and our commitment to working effectively with our European and international partners to use sanctions.

6. Part 1, Chapter 4: Court reviews

a) Background

The right to legal challenge is the hallmark of a fair, open and democratic society. Establishing a robust framework for designated persons to challenge their sanctions designations in the courts, by replacing the arrangements in place for people designated under EU sanctions, was therefore an important part of the system established by SAMLA.

b) Provisions

Section 38 provides the framework for decisions made under Part 1 of SAMLA to be challenged in the courts. These decisions include:

- under section 23 – an administrative reassessment of a UK designation;
- under section 24 – a UK government review of a UK designation;
- under section 25 – an administrative reassessment of a UN designation;
- under section 27 – an administrative reassessment of a UK-specified ship;
- under section 28 – a UK government review of a UK-specified ship;
- under section 29 – an administrative reassessment of a UN-designated ship;
- under section 36 or 37 – an administrative reassessment of a retained EU designation;
- other decisions made by an appropriate Minister in connection with a function of the Minister under Part 1 of SAMLA or regulations made under Part 1, with specific exceptions set out in section 38.

Section 38 sets out that those seeking a revocation or variation of their listing must first apply through the mechanism provided for in the relevant sections before they are able to access the redress through a legal challenge in the courts provided for in this section. The purpose of this requirement is to help ensure that redress is available as soon as reasonably practicable and to help minimise unnecessary litigation. Section 38 also sets out that the courts will apply the principles of judicial review when considering an application brought under this section.

Section 39 provides that where a court would otherwise have the power to award damages, it may not do so in relation to relevant claims, unless it is satisfied that the decision concerned was made in bad faith. Upon Royal Assent, section 39 included another route to damages where the court considered that the use of the power under challenge amounts to committing the tort of negligence⁴⁷ (see [section 6\(d\)](#) of this memorandum). This approach was comparable with the law on the award of

⁴⁷ Or for Scotland, that there has been negligence.

damages in sanctions cases within the EU. Section 39 also confirms that legal challenges are to be dealt with under the provisions in section 38.

Section 40 sets out that in respect of legal challenges under SAMLA, the government may apply to the court for sensitive material to be disclosed only to special advocates and the court in closed material proceedings, on the basis of this being in the public interest. This would enable the government to use sensitive information to support the imposition of sanctions on persons without the additional risks posed by more open disclosure of such material. It also sets out that the Lord Chancellor must consult the relevant heads of the judiciary in England and Wales and in Northern Ireland before making rules of court about this procedure⁴⁸.

c) Implementation

Sections 38 to 40 entered into force on 22nd November 2018 in accordance with The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 1) Regulations 2018 (S.I. 2018/1213) (C. 85).

In January 2019, the Civil Procedure (Amendment) (EU Exit) Rules 2019 (S.I. 2019/147) (L. 2) were made to set out the procedure for court reviews in England and Wales against sanctions decisions made under SAMLA, amending the existing rules of court so that the government can apply to the court for sensitive material to be disclosed only to special advocates and the court on the basis of this being in the public interest.

Also in January 2019, the Rules of the Court of Judicature (Northern Ireland) (Amendment) (EU Exit) 2019 (S.R. 2019/8) were made in Northern Ireland to set out the procedure for court reviews in Northern Ireland against sanctions decisions made under SAMLA, amending the existing rules of court so that the government can apply to the court for sensitive material to be disclosed only to special advocates and the court on the basis of this being in the public interest.

The Lord Chancellor consulted the Lord Chief Justice of England and Wales and the Lord Chief Justice of Northern Ireland respectively before making these Rules.

In February 2019, the Act of Sederunt (Rules of the Court of Session 1994 Amendment) (Sanctions and Anti-Money Laundering Act) 2019 (S.S.I. 2019/72) was made in Scotland to extend the application of the Rules of the Court of Session 1994 to sanctions proceedings under SAMLA.

⁴⁸ In Scotland, the power to make rules of court resides in the Court of Session, and this section makes no provision in respect of those rules.

To date, a number of cases have been brought against the government including proceedings under section 38 of SAMLA and at common law by way of Judicial Review. Certain key cases are summarised below.

i. Youssef, R (On the Application Of) v The Secretary of State for Foreign, Commonwealth and Development Affairs [2021] EWHC 3188 (Admin) (26 November 2021)⁴⁹

On 31st March 2021, Hany Youssef, who was designated a sanctioned person by the UN and subject to an asset freeze in the UK pursuant to The ISIL (Da'esh) and Al-Qaida (United Nations Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/466), issued a claim for Judicial Review of the imposition of financial sanctions on him. The claim sought an order quashing the regulations or, alternatively, a declaration that the duty in SAMLA to designate UN-listed persons is incompatible with Article 6 and/or Article 8 of the ECHR.

On 26th November 2021, the High Court dismissed the application, finding in favour of the Secretary of State on all grounds. In particular, the Court ruled that SAMLA's provisions for the review of UN listings are an effective remedy and compatible with the ECHR.

Therefore, while the courts can review a Secretary of State's decision whether to use best endeavours to seek removal of a designated person's name from a UN sanctions list, and could order the use of best endeavours, it remains the position that they cannot revoke or require revocation of UN listings, which would have put the UK in breach of its international obligations.

ii. LLC Synesis v Secretary of State for Foreign, Commonwealth and Development Affairs [2023] EWHC 541 (Admin) (14 March 2023)⁵⁰

In August 2022, LLC Synesis, a Belarussian company, sought to challenge its designation under The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (2019/600). This was the first Court Review to be brought under section 38 of SAMLA in relation to one of the UK's autonomous sanctions regimes.

The Belarussian company was designated on 31st December 2020 because of there being reasonable grounds to suspect that it supplied the Belarus Lukashenko regime with surveillance technology that has been used to track down civil society and pro-democracy activists. LLC Synesis challenged the evidential basis for the decision

⁴⁹ [Youssef, R \(On the Application Of\) v The Secretary of State for Foreign, Commonwealth and Development Affairs \[2021\] EWHC 3188 \(Admin\) \(26 November 2021\) – bailii.org](#)

⁵⁰ [LLC Synesis v Secretary of State for Foreign, Commonwealth And Development Affairs \[2023\] EWHC 541 \(Admin\) \(14 March 2023\) – bailii.org](#)

and the process by which it was made, raising legal arguments regarding the applicable standard of proof.

The High Court dismissed the application by LLC Synesis, finding in favour of the Secretary of State comprehensively on all grounds. In particular, the judgment confirmed that the government is entitled to take into account an array of information of varying quality in order to take an overall decision on whether reasonable grounds to suspect is established, but that the overall decision that there are “reasonable grounds to suspect” must still be rational. The High Court noted that the standard of review applied in a Court Review of the Secretary of State’s decision to designate should be based on well-established public law principles.

LLC Synesis did not seek permission to appeal the judgment.

iii. Mazepin v Secretary of State for Foreign Commonwealth and Development Affairs [2023] EWHC 1777 (Admin) (8 June 2023)⁵¹

On 20th April 2023, representatives for Nikita Mazepin submitted an application to the High Court under section 38 of SAML A for Court Review of his designation under The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855). The UK designated Mazepin on 15th March 2022.

This application included an interim relief application which, if successful, would suspend his travel ban and asset freeze in order to permit him inter alia to travel to the UK for Formula 1 team negotiations and to set up a UK bank account pending the full hearing of his case.

This was the first case under SAML A in which interim relief measures have been requested. Although SAML A provides that such challenges are decided under judicial review principles, it contains no explicit provisions for granting interim relief. A general power to grant interim injunctions is provided for by the Senior Courts Act 1981, which states that relief may be granted where it appears to the court to be “just and convenient to do so”.

On 8th June 2023 the Court refused the application by the Claimant for interim relief. In interim relief, the balance of convenience is assessed in the context of the exercise by the Secretary of State of an important public duty.

It had been submitted by the FCDO that ensuring the consistent implementation and enforcement of designations and upholding the integrity of the Russia sanctions regime as a whole was of critical importance given Russia’s full-scale invasion of Ukraine. It was submitted that the effect of the interim relief application would have been to lessen the impact of the UK’s response to the invasion. It was submitted that

⁵¹ [Mazepin v Secretary of State for Foreign Commonwealth and Development Affairs \[2023\] EWHC 1777 \(Admin\) \(08 June 2023\) – bailii.org](https://www.bailii.org/uk/ew/cas/2023/1777.html)

the interests pursued by the UK's use of sanctions as a foreign policy tool outweighed the interests of the individual such as would be served by interim relief.

iv. Dalston Projects Ltd & Ors v Secretary of State for Transport [2023] EWHC 1885 (Admin) (21 July 2023)⁵²

In March 2022, the then-Secretary of State for Transport detained the superyacht Phi under the powers in Regulation 57D of The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) on the basis that the vessel was owned or controlled by a person "connected with Russia", Sergei Naumenko. Mr Naumenko is not a designated person and was not subject to any sanctions measures at the time.

Dalston Projects, Prism Maritime Limited and Sergei Naumenko brought proceedings under section 38(2) of SAML A against the Secretary of State on the grounds that the Secretary of State had acted for an improper purpose in detaining the Phi and that the detention was disproportionate under Article 1 Protocol 1 of the ECHR.

On the 13th and 14th July 2023, the High Court heard the legal challenge. The court found in favour of DfT on all grounds and the claim was dismissed. The Claimants did not dispute that the ultimate beneficial owner of the yacht was a person connected with Russia. The court found that the detention was not for an improper purpose and "the fact that the FCDO decided not to designate Mr Naumenko has no bearing on the propriety of the Secretary of State acting under these distinct legislative provisions" in Part 6, regulation 57D. The court also found that there was no breach of Article 1 Protocol 1.

The judge placed weight on SAML A in defending the "broad and deep impact" of sanctions measures, not just including those who have committed acts of misconduct. The judgment states that proportionality was an objective assessment but that "the Secretary of State is entitled to a broad margin of discretion in deciding that the detention power is to be exercised in pursuit of the government's foreign policy aims."

The judge accepted DfT's case that in considering whether a "fair balance" had been struck, the Secretary of State need not demonstrate the efficacy of each individual detention or designation decision in order to maintain a sanctions measure, and that demonstrating any one decision would have the desired foreign policy outcome would be difficult and is not an issue for the court. All that is needed is a rational connection between the sanctions measure and the aim. The judgment also records the observation that the government could take into account the "signalling" impact of the measure, i.e. sending a message through the decision.

⁵² [Dalston Projects Ltd & Ors v Secretary of State for Transport \[2023\] EWHC 1885 \(Admin\) \(21 July 2023\) – bailii.org](https://www.bailii.org/uk/ew/cas/2023/1885.html)

An appeal was heard on the 17th January 2024.

v. Shvidler v Secretary of State for Foreign, Commonwealth and Development Affairs [2023] EWHC 2121 (Admin) (18 August 2023)⁵³

In July 2023, the High Court found in favour of the Secretary of State in a section 38 Court Review challenge to a designation under The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855), brought by Eugene Shvidler in December 2022.

Shvidler, a UK-US dual national, originally designated in March 2022, was designated on the basis of his association with Roman Abramovich and his former position as a non-executive director of Evraz plc, a Russia-based steel company. Shvidler challenged his designation on the grounds that the designation constitutes a disproportionate interference with his rights and that the Secretary of State has exercised his discretion in a discriminatory manner.

The High Court dismissed the application by Shvidler for the designation to be revoked, finding in favour of the Secretary of State comprehensively on both grounds. The judgment paid deference to many of the FCDO's arguments on whether the designation was rationally connected to the purposes of the sanctions regime.

In particular, although the court stated it is well placed to judge the reasonableness of the Secretary of State's analysis, the judgment stressed the "especially broad margin of discretion" afforded to the Secretary of State, noting his "institutional expertise" and entitlement to "considerable respect" on matters of foreign policy.

An appeal was heard on the 17th January 2024.

vi. Mikhail Fridman, R (on the application of) v HM Treasury [2023] EWHC 2657 (Admin) (26th October 2023)⁵⁴

On 22nd March 2023, a claim was filed against OFSI by Mikhail Fridman. This was the first claim filed against OFSI to the High Court under section 38 of SAML. It was also the first challenge to OFSI's licensing decision-making under The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855).

Mr Fridman argued that OFSI was wrong to refuse certain licence requests made under the prior obligations, basic needs and routine holding and maintenance licensing grounds in respect of his primary residence in the UK.

⁵³ [Shvidler v Secretary of State for Foreign, Commonwealth and Development Affairs \[2023\] EWHC 2121 \(Admin\) \(18 August 2023\) – bailii.org](#)

⁵⁴ [Fridman, R \(On the Application Of\) v HM Treasury \[2023\] EWHC 2657 \(Admin\) \(26 October 2023\) – bailii.org](#)

On 26th October 2023, the High Court dismissed the claim on all grounds of challenge. The judgment supported OFSI's long-standing view that OFSI has a "residual discretion to refuse to grant a licence, even if the conditions for the grant of a licence are met". OFSI's decisions were rational and within the bounds of this residual discretion. However, in recognising this residual discretion, the judgment determined that it "must be exercised consistently with the purposes" of the statutory regime.

The judgment also agreed with OFSI's position that the onus is on the applicant to provide all relevant information in their licence application to enable OFSI to make a decision as to whether a licensing ground applies. The judgment remarked that this approach was "perfectly sensible and a matter of common sense", and that "OFSI cannot be expected to know whether or not all information has been provided." The judgment also found that OFSI is not required to act as an "adviser to applicants" or identify gaps in licence applications.

Further to this, the judgment commented that "OFSI directed itself correctly in law and came to a lawful conclusion" on its interpretation of the prior obligations licensing ground: specifically, that a payment cannot be made directly or indirectly to another designated person, including where the payment is made to a person or entity which is owned or controlled by that designated person.

Finally, it was found that the review proceedings should not be used as a vehicle to pursue a "rolling" application and, therefore, evidence submitted post-decision was irrelevant.

This judgment indicates that OFSI properly implements financial sanctions through its licensing powers.

d) Legal Matters and Amendments

Section 39 of SAMLA was amended by Section 64 of the 2022 Act to limit the ability of a court to award damages other than in cases of bad faith. Section 64 of the 2022 Act also provided a power to make regulations to limit the amount of damages that a court can award.

The government subsequently made The Sanctions (Damages Cap) Regulations 2022 (S.I. 2022/1092) to specify that cap at £10,000. The cap does not apply where the court considers that it is necessary to disapply it so as not to breach the person's rights under the ECHR within the meaning of the Human Rights Act 1998.

e) Existing Reviews

The government has not published a review of the Court Review provisions of SAMLA. However, a wide range of legal firms and practitioners publish regular legal commentary on cases brought under SAMLA through their own channels.

f) Preliminary Assessment

The powers provided by Chapter 4 of Part 1 of SAMLA have self-evidently fulfilled SAMLA's objective of establishing a robust framework for designated persons to challenge their sanctions designations and upholding the UK's human rights obligations.

While each case will present its own complexities, this does not undermine our broader sanctions regime, and court rulings have so far affirmed the government's approach to making sanctions decisions.

7. Part 1, Chapter 5: Miscellaneous

a) Background

Chapter 5 sets out miscellaneous provisions in relation to the power to make sanctions regulations.

b) Provisions

Section 41 provides a power for the Secretary of State to make regulations setting out how goods seized from ships are to be dealt with.

Section 42 allows the government to suspend sanctions regulations (or specific restrictions within sanctions regulations) for a period of time during which they would remain on the statute book but not be binding within the UK. The purpose of this section is to allow flexibility in circumstances where sanctions might need to be temporarily lifted but where it might not be appropriate to revoke sanctions regulations completely.

Section 43 requires the Minister to issue guidance about the prohibitions and requirements made in new sanctions regulations, which may include best practice for compliance with sanctions, details about enforcement, and details of relevant exceptions.

Section 44 ensures that anyone who may have been liable to civil proceedings as a result of compliance with the regulations contained within SAMLA is not liable if they reasonably believe that they were acting in compliance with regulations in place at the time. The purpose of this section is to protect people from any adverse results generated by compliance with sanctions.

Section 45 enables the government to make regulations to revoke or amend existing regulations, as long as the amended regulations are appropriate for the purpose stated in them. When SAMLA was passed, section 45 required that for non-UN sanctions regulations the Minister must also consider that there are good reasons to pursue the stated purpose of the amended regulations and that the imposition of sanctions is a reasonable course of action for that purpose. Section 46 required the Minister to lay before Parliament a report setting out these reasons.

When SAMLA was passed, section 45 also stipulated that the Minister could not amend the stated purposes of non-UN sanctions regulations without revoking and remaking the regulations. Section 45 of SAMLA was amended and section 46 was removed in 2022 (see [section 7\(d\)\(i\)](#) of this memorandum).

Section 47 allows the Minister to amend Part 1 of SAMLA through regulations to add different types of sanctions not yet listed within Chapter 1 of the Act, where the UK is

or has been under a UN or other international obligation to impose that type of sanction.

Section 48 gives a power to the Secretary of State to make regulations setting out the mechanisms by which the immigration consequences of sanctions will be considered (including asylum, humanitarian protection, and human rights claims), to ensure that immigration claims are sent to the Home Secretary for decision and that appeals against such decisions are made to the Immigration and Asylum Chamber of the First Tier Tribunal.

c) Implementation

Sections 41 to 48 entered into force on 22nd November 2018 in accordance with The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 1) Regulations 2018 (S.I. 2018/1213) (C. 85).

No regulations have been made under section 41 to set out how goods seized from ships under sections 19 and 20 are to be dealt with.

To date, the power under section 42 of SAMLA to suspend sanctions regulations has not been used, as no circumstance has emerged since the passage of SAMLA to which the suspension of sanctions regulations has been deemed to be an appropriate foreign policy response.

Statutory guidance has been published in accordance with section 43 for every sanctions regime made under SAMLA, and the power to amend sanctions regulations provided by section 45 has been used multiple times (see [Annex A](#) of this memorandum).

Separately, three sets of sanctions regulations made under SAMLA have been revoked pursuant to section 45 of SAMLA in response to evolutions of sanctions policy:

- The Burma (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/136) were revoked by The Myanmar (Sanctions) Regulations 2021 (S.I. 2019/496) in response to a change in the UK government's policy towards Myanmar;
- The Misappropriation (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/1468) were revoked by the more expansive Global Anti-Corruption Sanctions Regulations 2021 (S.I. 2021/488);
- The Iran (Human Rights) (Sanctions) Regulations 2019 (S.I. 2019/134) were revoked by The Iran (Sanctions) Regulations 2023 (S.I. 2023/1314), which introduced new and enhanced sanctions powers in relation to Iran.

A small number of other revocations have been made to correct minor errors but otherwise to make the same provision as the revoked instrument (these revocations are noted throughout [Annex A](#) of this memorandum).

When it was obliged to do so, the government produced reports under section 46 of SAMLA for every amending set of sanctions regulations (see [Annex A](#) of this memorandum), with one exception due to an administrative oversight of which Parliament was notified (see [section 9\(c\)](#) of this memorandum).

The government has not yet had to use section 47 of SAMLA to add a different type of sanctions not currently listed within Chapter 1 of SAMLA, as no requirement to amend SAMLA in this way has arisen from the UK's UN or other international obligations.

In relation to section 48 of SAMLA, in October 2020 The Immigration (Persons Designated under Sanctions Regulations) (EU Exit) Regulations 2020 (S.I. 2020/1101) were made to ensure that the process for considering a human rights or protection claim was retained for those subject to new autonomous travel bans and is not conflated with the review and challenge mechanisms for the sanctions themselves.

These regulations were subsequently amended in December 2020 by The Immigration (Persons Designated under Sanctions Regulations) (EU Exit) (Amendment) Regulations 2022 (S.I. 2022/1394), which ensured that where a person is designated when they are lawfully in the UK (meaning that they are exempt from the effect of a travel ban, until either a decision is made on their human rights or protection claim or a Minister directs that the effect of the travel ban is enforced), they are no longer exempt from the effect of the travel ban if they leave the UK.

d) Legal Matters and Amendments

i. Amendments relating to revocation and amendment powers

Section 57 of the 2022 Act streamlined the conditions for making regulations to revoke or amend existing regulations under section 45 of SAMLA, and section 63 of the 2022 Act omitted the requirement for the Minister to produce an associated report under section 46 of SAMLA. The changes formed part of a broader package of amendments aimed at streamlining the processes associated with making sanctions regulations (see [section 3\(d\)](#) of this memorandum).

ii. Judicial consideration of the protection from civil legal liability

In *Celestial Aviation Services Limited v Unicredit Bank AG, London Branch* [2023] EWHC 1071 (Comm)⁵⁵, the High Court in England considered for the first time the application of section 44 of SAMLA and emphasised that reliance on section 44 of SAMLA as a defence in litigation requires a party to establish both that they believed

⁵⁵ [Celestial Aviation Services LTD v UniCredit Bank AG, London Branch \[2023\] EWHC 1071 \(Comm\) \(05 May 2023\) – bailii.org](#)

their act or omission complied with a prohibition under sanctions regulations and that such a belief was a reasonable one.

e) Existing Reviews

There are no notable relevant reviews to address here.

f) Preliminary Assessment

The provisions of Chapter 5 are technical provisions that support the implementation of the power to make sanctions regulations which in turn is aimed at achieving the overarching policy objectives of the Act.

The requirement to produce statutory guidance contributes to the government's objective of ensuring effective compliance with sanctions. Furthermore, the power to amend, revoke and suspend sanctions ensures that sanctions can be used in a tailored, flexible, and responsive way, and the fact that the UK has not yet been required to amend SAMLA to add new types of sanctions to keep up with its UN obligations demonstrates that the types of sanctions set out in sections 3 to 8 and Schedule 1 of SAMLA are fit for purpose.

Finally, the Parliamentary procedural requirements set out in Chapter 5 of SAMLA reflect the broad commitment throughout the Act to Parliamentary scrutiny of the UK's sanctions activity.

8. Part 2: Anti-money laundering

a) Background

Creating a power for the UK to make, amend, and repeal regulations relating to anti-money laundering and counter-terrorist financing activity was an important part of ensuring that the UK could continue to protect the security and integrity of the UK's financial system following the UK's exit from the EU, and that the UK could continue to adhere to evolving international standards in this area.

The relevant EU Directives that were in force in the UK prior to the UK's exit from the EU typically reflected the international standards set by the Financial Action Task Force ("FATF"), an international body of which the UK is a leading member.

b) Provisions

Section 49 enables the appropriate Ministers to make, amend and repeal regulations about money laundering and terrorist financing. The types of provision that can be made include:

- enabling or facilitating the detection or investigation of money laundering, or preventing money laundering;
- enabling or facilitating the detection or investigation of terrorist financing, or preventing terrorist financing;
- the implementation of Standards published by the FATF relating to combating threats to the integrity of the international financial system.

The power provided in section 49 also gives the appropriate Minister a legal power to amend domestic legislation transposing such EU law.

Schedule 2 of SAMLA provides further detail on the scope of the regulations that can be made under section 49. The effect of Schedule 2 is that regulations made under section 49 may make provisions addressing similar topics to those addressed in The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (S.I. 2017/692) ("the MLRs")⁵⁶.

Section 50 required the Secretary of State to publish and lay before Parliament three reports on the progress made towards putting in place a register of beneficial owners of overseas entities owning land in the UK. Each report was due after the expiry of a 12-month reporting period. The first period began upon the Royal Assent of SAMLA.

⁵⁶ The UK's powers under the European Communities Act 1972 Act had been used in June 2017 to transpose into UK law the Fourth EU Money Laundering Directive and elements of the Associated Funds Transfer Regulation in the MLRs.

The first and second reports published under section 50 were required to set out the steps that were to be taken in the next reporting period towards putting the register in place and an assessment as to when the register will be put in place. The third and final report was required to include a statement setting out what further steps, if any, were to be taken towards putting the register in place.

Section 51 required the Foreign Secretary to provide all reasonable assistance to the governments of British Overseas Territories to enable them to establish publicly accessible registers of beneficial ownership (“PARBOs”) of companies and to prepare by 31st December 2020 a draft Order in Council requiring the government of any Overseas Territory that has not introduced such a register to do so.

c) Implementation

Section 49 and Schedule 2 came into force on 31st December 2020 in accordance with the Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 2) Regulations 2020 (S.I. 2020/1535) (C. 43).

Since then, the government has made a range of statutory instruments under section 49 of SAMLA to amend the MLRs, including in relation to the registration of trusts and the list of High Risk Third Countries. A full list of the statutory instruments made under section 49 are provided in [section \(d\) of Annex A](#) of this memorandum. The vast majority of anti-money laundering regulations made under SAMLA have been made using draft affirmative procedures.

Section 49 does not give rise to any guidance or statistics. While the MLRs do create administrative structures in the form of the 25 supervisory authorities (including the Financial Conduct Authority, HMRC, the Gambling Commission and the 22 Professional Body Supervisors), these have been assessed separately (see [section 8\(e\)](#) of this memorandum).

Section 50 entered into force on 23rd May 2018 in accordance with Section 64 of SAMLA. The government subsequently reported to Parliament in 2019⁵⁷, 2020⁵⁸, and 2021⁵⁹ on the progress that had been made towards putting in place a register of beneficial owners of overseas entities in accordance with the requirements of section 50. Subsequently, the 2022 Act gave effect to the establishment of a register of overseas entities. The register, held by Companies House, opened on 1st August 2022⁶⁰.

Section 51 entered into force on 15th December 2020 in accordance with The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 2) Regulations

⁵⁷ [Hansard record, May 2019 \(Commons\)](#), and [Hansard record, May 2019 \(Lords\)](#)

⁵⁸ [Hansard record, July 2020 \(Commons\)](#), and [Hansard record, July 2020 \(Lords\)](#)

⁵⁹ [Hansard record, November 2021 \(Commons\)](#), and [Hansard record, November 2021 \(Lords\)](#)

⁶⁰ [Register an overseas entity and its beneficial owners – GOV.UK](#)

2020 (S.I. 2020/1535) (C. 43). The government prepared and published in December 2020 a draft Order in Council and explanatory note⁶¹ setting out the form that PARBOs must take in Overseas Territories and the minimum standards with which they should comply.

Since then, the UK government has provided technical assistance to Overseas Territories. The government has funded Open Ownership, an expert non-governmental organisation, to provide advice and technical support. The government also funded the purchase of a new register for Anguilla and has been supporting the drafting of legislation in several Overseas Territories. The government and Overseas Territories held meetings of the UK-OT Beneficial Ownership Transparency Technical Working Group in Autumn 2023. In December 2023, the government laid a Written Ministerial Statement to update Parliament and to set out a detailed breakdown of the commitments of each of the Overseas Territories to delivering greater beneficial ownership transparency⁶².

d) Legal Matters and Amendments

The definition of “terrorist financing” in paragraph section 49(3) of SAMLA was amended by The ISIL (Da’esh) and Al-Qaida (United Nations Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/466), The Counter-Terrorism (International Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/573), and The Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 (2019/577) to reflect offences created by those Regulations. The definition was also amended by the repeal of parts of The Terrorist Asset-Freezing etc. Act 2010 by Schedule 3 of SAMLA which came into force on 31st December 2020.

Paragraphs 4 and 23 of Schedule 2 of SAMLA were amended by section 187 of the 2023 Act to provide for ambulatory reference to the FATF’s prescribed list of High Risk Third Countries. Paragraph 22 of Schedule 2 of SAMLA was amended and Paragraph 22A of Schedule 2 was added by the Financial Services Act 2021 to extend application of the MLRs to certain overseas trustees with links to the UK.

e) Existing Reviews

The 2022 Review of the UK’s AML/CFT⁶³ regulatory and supervisory regime⁶⁴ included a backwards-looking “Post-Implementation Review of the MLRs and the Oversight of Professional Body AML Supervision Regulations 2017”. Three key findings of the review showed that:

⁶¹ [Overseas Territories: adopting publicly accessible registers of beneficial ownership – GOV.UK](#)

⁶² [Written Ministerial Statement, December 2023](#)

⁶³ Anti-money laundering and countering the financing of terrorism (“AML/CFT”)

⁶⁴ [Review of the UK’s AML/CFT regulatory and supervisory regime – GOV.UK](#)

- There are continuing deficiencies in money laundering and terrorist financing risk assessment and understanding across the regulated sector;
- Specific deficiencies remain in the application of risk-mitigating measures by the private sector, with supervisors noting inadequate customer due diligence or policies, controls and procedures as a common failing identified through their supervision;
- There have been some improvements in the supervision regime, with the Financial Conduct Authority and HMRC, for instance, both responding to recommendations from the FATF's Mutual Evaluation Report to strengthen their risk-based approach, but there is scope for all supervisors to further improve the effectiveness of their supervision.

The review also noted the government's commitment to ensuring that the regime is best prepared to meet the challenges of the future and recognised that further reform would help to improve the effectiveness of the regulations and their supervision. This included, for example, setting out clear new objectives for the MLRs in line with the FATF's methodology, embedding a renewed definition of effectiveness and using existing processes including the National Risk Assessment to consider emerging money laundering and terrorist financing risks and to consider sectors that may be appropriate for inclusion in scope of the MLRs.

In June 2023, the government published a consultation on reform of the AML/CFT supervisory system⁶⁵, proposing three objectives for supervisory reform: increased supervisory effectiveness, improved system co-ordination, and ensuring the chosen model is practically feasible.

f) Preliminary Assessment

The powers provided by section 49 have functioned satisfactorily in allowing for the amendment and improvement of the MLRs, and the government is confident that most of the requirements and provisions currently in the MLRs are generally sufficient. Furthermore, the requirement for the majority of anti-money laundering regulations to be made using draft affirmative procedures under SAMLA has increased Parliament's ability to scrutinise these regulations.

The government is committed to continuing to align with and champion the FATF's recommendations and to adopting the recommendations from the 2022 Review of the UK's AML/CFT regulatory and supervisory regime, and has committed to bring forward further changes to the MLRs in 2024 to reflect the findings of the 2022 Review. Regular updates to the regulations will continue to be needed in future as trends in money laundering and terrorist financing evolve and as potential improvements to the supervisory system are identified.

⁶⁵ [Reforming anti-money laundering and counter-terrorism financing supervision – GOV.UK](#)

Separately, the reporting requirement established by section 50 of SAML A facilitated Parliamentary scrutiny of the government's progress in putting in place a register of beneficial owners of overseas entities, prior to the passage of the 2022 Act.

Furthermore, in pursuit of SAML A's overarching objective of ensuring alignment with international anti-money laundering standards, the provision of section 51 has allowed the UK Government to set out a clear framework of minimum standards to guide the development of PARBOs in the Overseas Territories and created a strong mandate which the UK Government has been able to use to provide a range of administrative and technical support to the Overseas Territories on matters relating to PARBOs.

9. Part 3: General

a) Background

Part 3 of SAMLA contains general provisions to support Part 1 and Part 2.

b) Provisions

i. Supplementary

Section 52 provides that sanctions regulations and regulations under section 49 of SAMLA may make provision binding the Crown, although they may not make the Crown criminally liable, and that nothing in SAMLA affects His Majesty in His private capacity.

Section 53 ensures that the provisions of SAMLA do not abrogate or modify any prerogative power to exclude individuals from the UK, and that powers in SAMLA which may be exercised in relation to ships, including those in sections 19 and 20, would not limit powers which may be exercised in relation to ships by virtue of the Royal prerogative.

Section 54 enables the appropriate Minister to make consequential provision such as repealing, revoking or otherwise amending existing legislation. It also provides that regulations made under section 1 may only amend the definition of "terrorist financing" in SAMLA to add a reference to an offence where the purpose of the regulations containing the offence is compliance with a UN or other international obligation or a purpose related to the prevention of terrorism.

Section 55 sets out the Parliamentary procedures to be used for regulations made under SAMLA, covering the made-affirmative⁶⁶, draft-affirmative⁶⁷, and negative procedures⁶⁸. Section 56 allows Ministers to make regulations subject to slightly different procedures if they consider it appropriate to do so as a result of or in connection with the withdrawal of the UK from the EU, and sets out the detail of those different procedures.

Section 57 enables certain reports relating to sanctions regulations to be combined in one document, requires a written statement to be made by the Minister if reporting requirements are not complied with, and clarifies how those requirements apply.

Section 58 was consequential on provisions in The European Union (Withdrawal) Act 2018 and made clear that any restrictions in that Act on the modification of retained EU law did not prevent powers under SAMLA from being exercised in cases where

⁶⁶ i.e. coming into force immediately (for example to prevent asset flight) but requiring a vote of approval by in both Houses of Parliament within 28 days of being laid.

⁶⁷ i.e. requiring the approval of both Houses of Parliament before coming into force.

⁶⁸ i.e. remaining in force unless annulled by a resolution in either House of Parliament.

their exercise would interfere with a retained right that a person would otherwise have under section 4 of The European Union (Withdrawal) Act 2018. Section 58 was omitted by regulations made in 2023 (see [section 9\(d\)](#) of this memorandum).

Section 59 repeals most of Part 1 of the Terrorist Asset Freezing etc. Act 2010, and makes various consequential amendments and repeals which are set out in Schedule 3.

ii. Definitions

Section 60 defines “funds”, “economic resources” and the meaning of “freezing” in relation to both funds and economic resources which fall outside of the definition of funds. Section 61 defines “financial services” and “financial products”. Section 62 defines a wide range of other terms used in SAMLA.

iii. Final provisions

Section 63 provides that, with some minor exceptions, the Act extends to England and Wales, Scotland, and Northern Ireland. It also provides that any of the provisions of Part 1, Section 51 of Part 2, Part 3, and any regulations made under Part 1 may be extended with or without modification by Order in Council to any of the Channel Islands, the Isle of Man, or any of the British Overseas Territories.

Section 64 sets out when the provisions of SAMLA come into force, either on the day after SAMLA receives Royal Assent or on a day appointed by the Secretary of State. Section 65 gives SAMLA its short title.

c) Implementation

Sections 52 to 65 and Schedule 3 entered into force according to the timescales set out in Table C overleaf.

Provisions of some sanctions regulations made during the Transition Period were brought into force by The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627), The Counter-Terrorism (Sanctions) (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1416) (C. 39), and The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42), and using the alternative Parliamentary procedures established by section 56 of SAMLA.

Other and subsequent sanctions regulations were made and brought into force in accordance with the Parliamentary procedures set out in section 55 of SAMLA. A range of sanctions regulations have also relied on the consequential provisions set out in Section 54.

Table C: Entry into force of Part 3 provisions

Sections	Date of entry into force	Source of date
52 to 56, 60 to 65	23 rd May 2018	Section 64 of SAMLA
57, 58, 59(4) ⁶⁹ , Paragraphs 1 to 8(3) of Schedule 3	22 nd November 2018	The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 1) Regulations 2018 (S.I. 2018/1213) (C. 85)
59(1) to 59(3), 59(5) ⁷⁰ , Paragraphs 9 ⁷¹ and 10 of Schedule 3	31 st December 2020	The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 2) Regulations 2020 (S.I. 2020/1535) (C. 43)
59(4) ⁷² , Paragraph 8(4) of Schedule 3	27 th May 2021	The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 3) Regulations 2021 (S.I. 2018/628) (C. 26)

When the government was required to produce reports under sections 2, 18, and 46, the government published these reports individually rather than using the provision of section 57 enabling these reports to be combined in one document.

In September 2020, the government made a written statement to Parliament⁷³ in accordance with section 57 of SAMLA to address an administrative oversight which had meant that the report required by Section 46 of SAMLA had not been laid before Parliament in respect of The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2019 (S.I. 2019/843). This was the only time the government was required to make a written statement in accordance with section 57 before the requirement to make reports under section 46 was omitted by the 2022 Act (see [section 7\(c\)](#) of this memorandum).

Every sanctions regime made under SAMLA has been extended by Order in Council to the British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) using the power set out in section 63 of SAMLA (see [Annex A](#) of this memorandum).

⁶⁹ So far as it relates to paragraphs 1 to 8(3) of Schedule 3.

⁷⁰ So far as it relates to paragraph 9 of Schedule 3 of SAMLA (except the revocations in The Electronic Money Regulations 2011 (S.I. 2011/99) and The Payment Services Regulations 2017 (S.I. 2017/752)) and paragraph 10 of Schedule 3 of SAMLA.

⁷¹ Except the revocations in The Electronic Money Regulations 2011 (S.I. 2011/99) and The Payment Services Regulations 2017 (S.I. 2017/752).

⁷² In so far as it was not already in force.

⁷³ [Hansard record, 2020](#).

UK sanctions also apply in the Crown Dependencies. The Bailiwicks of Guernsey and Jersey implement sanctions under their own legislative arrangements. The Isle of Man can implement sanctions linked to EU Exit under their own legislative arrangements, but due to current gaps in the Isle of Man's primary legislative powers the FCDO exceptionally lays Orders in Council to extend new sanctions regulations to the Isle of Man. The FCDO are assured that the appropriate powers will be in place in the coming year.

d) Legal Matters and Amendments

Section 55 of SAMLA was amended by section 64 of the 2022 Act to ensure consistency with the changes to section 39 of SAMLA made by the 2022 Act. Section 55 of SAMLA was also amended by section 187 of the 2023 Act to ensure consistency with changes to Schedule 2 of SAMLA made by the 2023 Act.

Section 57 of SAMLA was amended by section 63 of the 2022 Act to ensure consistency with the removal of various reporting requirements by the 2022 Act.

Section 58 was omitted by the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023 (S.I. 2023/1424), which also made amendments to a number of other sections of SAMLA, to remove references to retained EU law in accordance with the Retained EU Law (Revocation and Reform) Act 2023.

A range of Orders in Council have been revoked, corresponding to the revocation of sanctions regulations under section 45 of SAMLA (revoked Orders in Council are identified in [Annex A](#) of this memorandum).

e) Existing reviews

There are no notable relevant reviews to address here.

f) Preliminary Assessment

The provisions of Chapter 5 are technical provisions that support the implementation of other provisions in the Act. Notable specific features of these provisions include the flexibility provided by section 56, which ensured the government could bring sanctions regulations into force flexibly during the Transition Period, and the legislative consistency provided by section 57 of SAMLA which has enabled the UK, the Crown Dependencies and the Overseas Territories to work in lockstep together to enforce UK sanctions.

10. Case study: Russia sanctions

The UK's current Russia sanctions regime was established by The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855). These regulations were made on the 10th April 2019 pursuant to the powers set out in SAMLA and were intended to achieve the same policy effect as the two EU regimes on Russia and Crimea.

The 2019 Regulations were accompanied by a report on the purposes of the 2019 Regulations as was then required by section 2(4) of SAMLA, and a report on new offences as was then required by section 18. The government first published statutory guidance for the Russia regime on the 9th May 2019.

The 2019 Regulations were amended twice in 2020 through cross-cutting regulations aimed at ensuring consistency, clarity, and accuracy across the body of sanctions regulations made during the Transition Period and reflecting policy changes following the UK's exit from the EU. The 2019 Regulations were also extended with modifications to all British Overseas Territories except Bermuda and Gibraltar (which make their own legislative arrangements) by regulations made during the Transition Period using the powers provided in section 63 of SAMLA.

By the end of the Transition Period, 226 designations under the EU's Russia and Crimea regimes had been transitioned into UK law.

In February 2022, the UK government used the powers set out in SAMLA to amend the 2019 Regulations in response to Russia's aggressive actions on the border of Ukraine, significantly broadening the range of people, business and other entities that the UK could designate in response to future Russian aggression against Ukraine. The government also published a corresponding section 46 report.

Russia subsequently launched a full-scale invasion of Ukraine on the 24th February 2022.

Since then, the UK government has used the powers provided by SAMLA to amend the 2019 Regulations over 20 times, expanding the scale and scope of the UK's sanctions against Russia, and publishing corresponding section 18 and section 46 reports until the requirements to do so were repealed by the 2022 Act.

Under the Russia sanctions regime, the UK – working with international partners – has put in place the most severe package of sanctions ever imposed on a major economy, inflicting an economic cost on Putin's regime, putting pressure on the regime to end its illegal war in Ukraine, undermining Russia's war effort, and demonstrating solidarity and support for Ukraine.

During this period, the rapid and responsive growth of the UK's Russia sanctions regime, and our ability to coordinate our sanctions approach with international allies

including G7 and EU partners, benefited significantly from the new streamlined processes introduced by the 2022 Act and other amendments to SAMLA such as the broadening of criteria.

Since the start of Russia's full-scale invasion of Ukraine, the government has used its designation powers to strategically target individuals and entities within key sectors such as the Russian military industrial complex and political elites, as well as those who directly supported the war (for example those voting in favour of the invasion within the Dumas and Federation Council). This brings the total number of the UK's Russia designations to over 1900.

We have also introduced new sanctions measures in key sectors such as finance, energy and services, and have prevented Russia's military from accessing Western components and technology. These sanctions have been carefully designed to maximise impact on Putin's capacity to fund his war, impede supply chains and technological advancement, and target those who prop up Putin and his regime. Without international sanctions, we estimate Russia would have over \$400 billion more to fund its war machine – this is equivalent to an additional four years of funding for Russia's invasion⁷⁴.

The UK's sanctions enforcement bodies have worked tirelessly to ensure that sanctions against Russia are implemented and enforced.

Through the implementation of sanctions regulations, the UK alongside allies has collectively immobilised over 60% of Russia's central bank foreign reserves, and as of October 2023 over £22 billion of Russian assets were reported frozen as a result of UK financial sanctions⁷⁵ – assets that can no longer be funnelled back to Russia to fund its war machine. 96% (£20 billion) of the goods that the UK traded with Russia in 2021 have also been sanctioned.

Furthermore, International Energy Agency data on Russian oil export revenues up to December 2023 suggests that the oil price cap has contributed to reducing Russian oil export revenues by roughly 22% in the first eleven months of the 2023 calendar year when compared to the same period in 2022.

Travel bans against designated persons are enforced through the immigration system. There are also transport sanctions in place – Russian ships are banned from UK ports, and it is a criminal offence for any Russian aircraft to fly or land in the UK.

We are also continuing to bear down on sanctions evasion and circumvention. We are taking direct action against those supplying equipment to Russia's military, for example, by sanctioning over 30 individuals and entities in third countries. We have

⁷⁴ HMG analysis of public economic data

⁷⁵ HMG analysis of public economic data

published guidance on circumvention methods and addressing these risks with due diligence and improved internal controls.

In line with section 15 of SAMLA, the regulations comprising the UK's Russia sanctions regime include a range of exceptions, including in relation to humanitarian assistance activity, health emergencies, and natural disasters.

Since the start of the invasion, OFSI has issued General Licences in respect of the UK's Russia sanctions regime, including in relation to humanitarian activity, charities, civilian telecommunications services and news media services. General Trade Licences have also been issued by DBT, permitting certain specific otherwise-prohibited activities. The conditions of these General Trade Licences, and further information relating to their use, can be found in the licences themselves and in specific published guidance.

The statutory guidance for the Russia regime has been updated regularly to reflect the passage of new sanctions regulations and other developments such as the addition of new licensing grounds.

OFSI has made one public disclosure of a breach of the Russia regulations which it published in August 2023 on its website⁷⁶. In August 2023, a UK company was fined £1 million by HMRC in relation to the unlicensed trade of goods in breach of the Russian regulations⁷⁷.

See [section \(b\)\(xx\) of Annex A](#) of this memorandum for more information.

⁷⁶ [Enforcement of financial sanctions – GOV.UK](#)

⁷⁷ [NTE 2023/17: a compound settlement – GOV.UK](#)

Annex A: Secondary Legislation, Statutory Reports, and Statutory Guidance

This Annex provides a list of statutory instruments made pursuant to SAMLA. These are grouped by:

- a) [Statutory instruments relating to thematic sanctions regimes;](#)
- b) [Statutory instruments relating to geographic sanctions regimes;](#)
- c) [Cross-cutting regulations relating to SAMLA's sanctions provision;](#)
- d) [Statutory instruments relating to SAMLA's anti-money laundering provision.](#)

Where relevant, links to the relevant statutory reports and guidance produced as required by SAMLA are also provided.

As with the body of this memorandum, the content of this Annex is accurate as of 31st December 2023.

a) Statutory instruments relating to thematic sanctions regimes

i. Chemical Weapons

Name	Date made	Purpose	Statutory Report(s)
The Chemical Weapons (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/618)	20 th March 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to the use and proliferation of chemical weapons after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime concerning restrictive measures against the proliferation and use of chemical weapons that was previously in force under EU legislation and related UK regulations.	Section 2(4) report and section 18 report .
The Chemical Weapons (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1267) ⁷⁸	11 th November 2020	To extend with modifications The Chemical Weapons (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/618) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);

⁷⁸ The Chemical Weapons (Sanctions) (Overseas Territories) Order 2018 (S.I. 2018/1361) (revoked) was not made using SAML powers and is not included here.

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 22nd October 2019.

ii. Cyber Activity

Name	Date made	Purpose	Statutory Report(s)
The Cyber (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/597)	15 th June 2020	To ensure that the UK continues to operate an effective cyber sanctions regime after the end of the Transition Period, replacing with a similar effect the EU sanctions regime relating to cyber security that was previously in force under EU legislation and related UK regulations.	Section 2(4) report and section 18 report .
The Cyber (Sanctions) (Overseas Territories) (No. 2) Order 2020 (S.I. 2020/1270) ⁷⁹	11 th November 2020	To extend with modifications The Cyber (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/597) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 3rd November 2020.

⁷⁹ The Cyber (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/281) (revoked) was not made using SAML powers and is not included here.

iii. Domestic Counter-Terrorism

Name	Date made	Purpose	Statutory Report(s)
The Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/577)	14 th March 2019	To replace with substantially the same effect the Terrorist Asset-Freezing etc. Act 2010 when Part 1 is repealed after the UK leaves the EU.	Section 2(4) report and section 18 report .
The Counter-Terrorism (Sanctions) (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1416) (C. 39)	3 rd December 2020	To bring into force The Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/577).	
The Counter-Terrorism (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1564)	16 th December 2020	To extend with modifications The Counter-Terrorism (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1564) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions (EU Exit) (Consequential Provisions) (Amendment) Regulations 2020 (S.I. 2020/1289);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819).

[Statutory guidance](#) for this regime was published on 20th March 2019.

iv. Global Anti-Corruption

Name	Date made	Purpose	Statutory Report(s)
The Misappropriation (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/1468) (revoked)	7 th December 2020	To ensure that the UK continues to operate an effective sanctions regime in relation to the misappropriation of state funds after the end of the Transition Period, replacing with a similar effect the separate EU misappropriations sanctions regimes relating to Tunisia, Egypt and Ukraine.	Section 2(4) report and section 18 report .
The Misappropriation (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1575) (revoked)	16 th December 2020	To extend with modifications The Misappropriation (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/1468) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	
The Global Anti-Corruption Sanctions Regulations 2021 (S.I. 2021/488)	23 rd April 2021	To enable the Secretary of State to impose financial sanctions and travel bans on persons involved in serious corruption.	Section 2(4) report and section 18 report .
The Global Anti-Corruption Sanctions (Overseas Territories) Order 2021 (S.I. 2021/525)	28 th April 2021	To extend with modifications The Global Anti-Corruption Sanctions Regulations 2021 (S.I. 2021/488) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

The Global Anti-Corruption Sanctions (Isle of Man) Order 2021 (S.I. 2021/526)	28 th April 2021	To extend to the Isle of Man with modifications The Global Anti-Corruption Sanctions Regulations 2021 (S.I. 2021/488) as amended from time to time.	
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See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for the Global Anti-Corruption Regime and an [information note for non-governmental organisations](#) were published on 26th April 2021.

v. **Global Human Rights**

Name	Date made	Purpose	Statutory Report(s)
The Global Human Rights Sanctions Regulations 2020 (S.I. 2020/680)	5 th July 2020	To enable the Secretary of State to impose asset freezes and travel bans on persons involved in activities which, if carried out by or on behalf of a State, would amount to a serious violation of certain human rights by that State.	Section 2(4) report and section 18 report .
The Global Human Rights Sanctions (Overseas Territories) Order 2020 (S.I. 2020/773)	21 st July 2020	To extend with modifications The Global Human Rights Sanctions Regulations 2020 (S.I. 2020/680) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	
The Global Human Rights Sanctions (Isle of Man) Order 2020 (S.I. 2020/774)	21 st July 2020	To extend with modifications The Global Human Rights Sanctions Regulations 2020 (S.I. 2020/680) as amended from time to time to the Isle of Man.	

See also in [section \(c\) of this Annex](#):

- The Sanctions (Overseas Territories) (Amendment) Order 2020 (S.I. 2020/1582);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime and an [information note for non-governmental organisations](#) were published on 6th July 2020.

vi. International Counter-Terrorism

Name	Date made	Purpose	Statutory Report(s)
The Counter-Terrorism (International Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/573)	14 th March 2019	To provide for part of the UK's counter-terrorism sanctions regimes after the UK leaves the EU, replacing with substantially the same effect counter-terrorism regimes that were previously in force under a range of EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Counter-Terrorism (International Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1588)	16 th December 2020	To extend with modifications The Counter-Terrorism (International Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/573) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2019 (S.I. 2019/843);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2020 (S.I. 2020/591);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions (EU Exit) (Consequential Provisions) (Amendment) Regulations 2020 (S.I. 2020/1289);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819).

[Statutory guidance](#) for this regime was published on 3rd May 2019.

vii. ISIL (Da'esh) and Al Qaeda

Name	Date made	Purpose	Statutory Report(s)
The ISIL (Da'esh) and Al-Qaida (United Nations Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/466)	5 th March 2019	To give effect to the UK's obligations under UN Security Council Resolution 2368 after the UK leaves the EU, replacing with substantially the same effect the relevant existing EU legislation and related UK legislation.	Section 18 report.
The ISIL (Da'esh) and Al-Qaida (United Nations Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1608)	16 th December 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The ISIL (Da'esh) and Al-Qaida (United Nations Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/466) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAMLA (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 1(b) of UN Security Council Resolution 2368 (2017) in relation to all persons included on the ISIL (Da'esh) and Al-Qaida Sanctions list created pursuant to UN Security Council Resolutions 1267	

		(1999), 1333 (2000), 1989 (2011), 2083 (2012), 2161 (2014) and 2253 (2015).	
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See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2019 (S.I. 2019/843);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2020 (S.I. 2020/591);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions (EU Exit) (Consequential Provisions) (Amendment) Regulations 2020 (S.I. 2020/1289);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 3rd May 2019 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

viii. Unauthorised Drilling Activities

Name	Date made	Purpose	Statutory Report(s)
The Unauthorised Drilling Activities in the Eastern Mediterranean (Sanctions) (EU Exit) Regulations 2020 (2020/1474)	7 th December 2020	To ensure that the UK continues to operate an effective sanctions regime in relation to unauthorised drilling activities in the Eastern Mediterranean after the end of the Transition Period, replacing with a similar effect the relevant existing EU sanctions regime and related UK legislation.	Section 2(4) report and section 18 report .
The Unauthorised Drilling Activities in the Eastern Mediterranean (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1579)⁸⁰	16 th December 2020	To extend with modifications The Unauthorised Drilling Activities in the Eastern Mediterranean (Sanctions) (EU Exit) Regulations 2020 (2020/1474) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 31st December 2020.

⁸⁰ The Turkey (Sanctions) (Unauthorised Drilling Activities in the Eastern Mediterranean) (Overseas Territories) Order 2020 (SI. 2020/283) was not made using SAMLA powers and is not included here.

b) Statutory instruments relating to geographic sanctions regimes

i. Afghanistan

Name	Date made	Purpose	Statutory Report(s)
The Afghanistan (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/948)	3 rd September 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolution 2255 after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation, and to ensure that the UK can operate an effective and autonomous sanctions regime in relation to Afghanistan.	Section 18 report.
The Afghanistan (Sanctions) (Overseas Territories) Order 2020 (SI2020/1284)	11 th November 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Afghanistan (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/948) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAML A (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 1(b) of UN Security Council Resolution 2255 (2015) in relation to	

		persons designated by the Sanctions Committee.	
The Afghanistan (Sanctions) (EU Exit) (Amendment) Regulations 2022 (S.I. 2022/65)	25 th January 2022	To amend The Afghanistan (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/948), implementing an exception created by the UN Security Council to financial sanctions under the UN Afghanistan sanctions regime, to facilitate humanitarian assistance and other activities that support basic human needs in Afghanistan.	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 5) Regulations 2020 (S.I. 2020/1397);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819).

[Statutory guidance](#) for this regime was published on 31st December 2020.

ii. Republic of Belarus

Name	Date made	Purpose	Statutory Report(s)
The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600)	18 th March 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Belarus after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Belarus that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Republic of Belarus (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1271)	11 th November 2020	To extend with modifications The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	
The Republic of Belarus (Sanctions) (EU Exit) (Amendment) Regulations 2021 (S.I. 2021/922) (revoked)	5 th August 2021	To amend The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600) to introduce new financial, trade and aircraft sanctions measures.	
The Republic of Belarus (Sanctions) (EU Exit) (Amendment) (No. 2) Regulations 2021 (S.I. 2021/1146)	11 th October 2021	To amend The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600), revoking and replacing The Republic of Belarus (Sanctions) (EU Exit) (Amendment) Regulations 2021 (S.I. 2021/922).	Section 18 report and section 46 report .

The Republic of Belarus (Sanctions) (Overseas Territories) (Amendment) Order 2021 (S.I. 2021/1256)	10 th November 2021	To amend The Republic of Belarus (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1271) in consequence of the amendments to The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600) made by The Republic of Belarus (Sanctions) (EU Exit) (Amendment) (No. 2) Regulations 2021 (S.I. 2021/1146).	
The Republic of Belarus (Sanctions) (EU Exit) (Isle of Man) Order 2021 (S.I. 2021/1257) (revoked)	10 th November 2021	To extend to the Isle of Man with modifications The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600) as amended from time to time.	
The Republic of Belarus (Sanctions) (EU Exit) (Amendment) Regulations 2022 (S.I. 2022/748)	30 th June 2022	To amend The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600), introducing additional purposes, widening the designation powers, and introducing new financial, trade, shipping and aircraft sanctions measures.	
The Republic of Belarus (Sanctions) (Overseas Territories) (Amendment) Order 2022 (S.I. 2022/1339)	14 th December 2022	To amend The Republic of Belarus (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1271) and to extend with modifications the sanctions regime established by The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement	

		sanctions through their own domestic legislation).	
The Republic of Belarus (Sanctions) (EU Exit) (Isle of Man) (Revocation) Order 2023 (S.I. 2023/553)	17 th May 2023	To revoke The Republic of Belarus (Sanctions) (EU Exit) (Isle of Man) Order 2021 (S.I. 2021/1257) which became redundant in consequence of legislation subsequently made by Isle of Man.	
The Republic of Belarus (Sanctions) (EU Exit) (Amendment) Regulations 2023 (S.I. 2023/616)	6 th June 2023	To amend The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600) to widen the designation powers and introduce new trade sanctions and other measures.	

[Statutory guidance](#) for this regime was published on 15th January 2020 and has been updated numerous times to reflect legislative changes.

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

iii. Bosnia and Herzegovina

Name	Date made	Purpose	Statutory Report(s)
The Bosnia and Herzegovina (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/608)	18 th June 2020	To ensure that the UK continues to operate an effective sanctions regime in relation to Bosnia and Herzegovina after the end of the Transition Period, replacing the EU sanctions regime relating to Bosnia and Herzegovina which was established on 21 March 2011.	Section 2(4) report and section 18 report .
The Bosnia and Herzegovina (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1268)	11 th November 2020	To extend with modifications The Bosnia and Herzegovina (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/608) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 3rd November 2020.

iv. Burundi

Name	Date made	Purpose	Statutory Report(s)
The Burundi (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/1142)	18 th July 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Burundi after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Burundi that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Burundi (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1263)	11 th November 2020	To extend with modifications The Burundi (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/1142) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	
The Burundi (Sanctions) Regulations 2021 (S.I. 2021/1404) (expired—not approved)	8 th December 2021	To establish a UK autonomous sanctions regime in respect of Burundi comprising financial and immigration sanctions, replacing the existing sanctions regime established by The Burundi (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/1142). NB: These regulations were not approved by both Houses of Parliament within the same 28-day period and therefore fell. The Burundi (Sanctions)	Section 2(4) report and section 18 report .

		(EU Exit) Regulations 2019 (S.I. 2019/1142) therefore remain in force.	
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See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 23rd October 2019.

v. Central African Republic

Name	Date made	Purpose	Statutory Report(s)
The Central African Republic (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/616)	18 th June 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolutions 2127 (2013) and 2134 (2014) after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation, and to ensure that the UK can operate an effective and autonomous sanctions regime in relation to the Central African Republic.	Section 2(4) report and section 18 report .
The Central African Republic (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1286)	11 th November 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Central African Republic (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/616) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAMLA (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 30 of UN Security Council	

		Resolution 2134 (2014) in relation to any persons designated by the Security Council or its Committee established pursuant to UN Security Council Resolution 2127 (2013).	
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See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 31st December 2020 and was updated in 2022 and 2023 to reflect legislative changes.

vi. Democratic People's Republic of Korea

Name	Date made	Purpose	Statutory Report(s)
The Democratic People's Republic of Korea (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/411)	5 th March 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to the Democratic People's Republic of Korea after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to the Democratic People's Republic of Korea that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Democratic People's Republic of Korea (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1561)	16 th December 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Democratic People's Republic of Korea (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/411) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAMLA (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 8(e) of	

		UN Security Council Resolution 1718 (2006) in relation to persons designated by the Security Council or its Committee.	
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See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2019 (S.I. 2019/843);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2020 (S.I. 2020/591);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 31st December 2020 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

vii. Democratic Republic of the Congo

Name	Date made	Purpose	Statutory Report(s)
The Democratic Republic of the Congo (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/433)	4 th March 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to the Democratic Republic of the Congo after the UK left the EU, replacing with substantially the same effect the EU sanctions regime relating to the Democratic Republic of the Congo that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Democratic Republic of the Congo (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1281)	11 th November 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Democratic Republic of the Congo (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/433) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAML A (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 9 of UN Security Council Resolution 1807 (2006) in relation to	

		persons designated by the Security Council or its Committee under paragraph 13 of that Resolution.	
The Democratic Republic of the Congo (Sanctions) (EU Exit) (Amendment) Regulations 2021 (S.I. 2021/1041)	13 th September 2021	To amend The Democratic Republic of the Congo (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/433) to enable financial sanctions required by the UN on the basis of the additional designation criterion in paragraph 3 of UN Security Council Resolution 2582 to be implemented, and to correct an error in The Democratic Republic of the Congo (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/433).	Section 46 report.
The Democratic Republic of the Congo (Sanctions) (EU Exit) (Amendment) Regulations 2022 (S.I. 2022/1236)	28 th November 2022	To amend The Democratic Republic of the Congo (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/433), inserting a reference to a new designation criterion in paragraph 3 of UN Security Council Resolution 2641, removing references to UN Security Council Resolutions which have been superseded, and adding the new criterion to the domestic designation criteria.	

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2020 (S.I. 2020/591);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);

- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 3rd May 2019 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

viii. Guinea

Name	Date made	Purpose	Statutory Report(s)
The Guinea (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/1145)	18 th July 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Guinea after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Guinea that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Guinea (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1266)	11 th November 2020	To extend with modifications The Guinea (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/1145) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 29th October 2019.

ix. Guinea-Bissau

Name	Date made	Purpose	Statutory Report(s)
The Republic of Guinea-Bissau (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/554)	13 th March 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Guinea-Bissau after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Guinea-Bissau that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Republic of Guinea-Bissau (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1587)	16 th December 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Republic of Guinea-Bissau (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/554) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAMLA (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 4 of UN Security Council Resolution 2048 (2012)	

		in relation to persons designated by the Security Council or its Committee under paragraph 9(b) of that Resolution.	
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See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 11th April 2019.

x. Haiti

Name	Date made	Purpose	Statutory Report(s)
The Haiti (Sanctions) Regulations 2022 (S.I. 2020/1281)	5 th December 2022	To give effect to the UK's obligations under UN Security Council Resolution 2653 (2022).	
The Haiti (Sanctions) (Isle of Man) Order 2022 (S.I. 2022/1340)	14 th December 2022	To extend to the Isle of Man with modifications The Haiti (Sanctions) Regulations 2022 (S.I. 2020/1281) as amended from time to time.	
The Haiti (Sanctions) (Overseas Territories) Order 2022 (S.I. 2022/1347)	14 th December 2022	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Haiti (Sanctions) Regulations 2022 (S.I. 2020/1281) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAML A (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 3 of UN Security Council Resolution 2653 (2022) in relation to persons designated by the Sanctions Committee established in accordance with that resolution.	

The Haiti (Sanctions) (Amendment) Regulations 2023 (S.I. 2023/1320)	5 th December 2023	To give effect to the UK's obligations under UN Security Council Resolutions 2699 (2023) and 2700 (2023) which amended Resolution 2653 (2022).	
The Haiti (Sanctions) (Isle of Man) (Amendment) Order 2023 (S.I. 2023/1379)	13 th December 2023	To amend The Haiti (Sanctions) (Isle of Man) Order 2022 (S.I. 2022/1340) in consequence of amendments made to The Haiti (Sanctions) Regulations 2022 (S.I. 2022/1281) by The Haiti (Sanctions) (Amendment) Regulations 2023 (S.I. 2023/1320).	
The Haiti (Sanctions) (Overseas Territories) (Amendment) Order 2023 (S.I. 2023/1383)	13 th December 2023	To amend The Haiti (Sanctions) (Overseas Territories) Order 2022 (S.I. 2022/1347) in consequence of amendments made to The Haiti (Sanctions) Regulations 2022 (S.I. 2022/1281) by The Haiti (Sanctions) (Amendment) Regulations 2023 (S.I. 2023/1320).	

See also in [section \(c\) of this Annex](#):

- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 9th December 2022 and was updated twice in 2023 to reflect legislative changes.

xi. Iran

Name	Date made	Purpose	Statutory Report(s)
The Iran (Sanctions) (Human Rights) (EU Exit) Regulations 2019 (S.I. 2019/134) (revoked)	29 th January 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Iran after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Iran that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Iran (Sanctions) (Human Rights) (Overseas Territories) Order 2020 (S.I. 2020/1598) (revoked)	16 th December 2020	To extend with modifications The Iran (Sanctions) (Human Rights) (EU Exit) Regulations 2019 (S.I. 2019/134) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

[Statutory guidance](#) for this regime was published on 31st January 2019.

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

Name	Date made	Purpose	Statutory Report(s)
The Iran (Sanctions) Regulations 2023 (S.I. 2023/1314)	11 th December 2023	<p>To create a new sanctions regime in relation to Iran to deter the Government of Iran or an armed group backed by the Government of Iran from conducting hostile activity against the United Kingdom or any other country and to encourage the Government of Iran to comply with international human rights law and to respect human rights.</p> <p>These regulations replace the existing Iran Human Rights sanctions regime established by The Iran (Sanctions) (Human Rights) (EU Exit) Regulations 2019 (S.I. 2019/134).</p>	
The Iran (Sanctions) (Isle of Man) Order 2023 (S.I. 2023/1376)	13 th December 2023	To extend to the Isle of Man with modifications the Iran (Sanctions) Regulations 2023 (S.I. 2023/1314) as amended from time to time.	
The Iran (Sanctions) (Overseas Territories) Order 2023 (S.I. 2023/1377)	13 th December 2023	To extend with modifications The Iran (Sanctions) Regulations 2023 as amended from time to time to all British overseas territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

[Statutory guidance](#) for this regime was published on 15th December 2023.

xii. Iran (Nuclear)

Name	Date made	Purpose	Statutory Report(s)
The Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019 (S.I. 2019/461)	5 th March 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Iran after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Iran's nuclear programmes that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Iran (Sanctions) (Nuclear) (Overseas Territories) Order 2020 (S.I. 2020/1563)	16 th December 2020	To extend with modifications The Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019 (S.I. 2019/461) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2019 (S.I. 2019/843);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2020 (S.I. 2020/591);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 31st December 2020 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

xiii. Iraq

Name	Date made	Purpose	Statutory Report(s)
The Iraq (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/707)	7 th July 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolutions 661 (1990) and 1483 (2003) after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation.	Section 18 report.
The Iraq (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1260)	11 th November 2020	To extend with modifications The Iraq (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/707) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 31st December 2020 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

xiv. Lebanon

Name	Date made	Purpose	Statutory Report(s)
The Lebanon (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/612)	18 th June 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolution 1701 (2006) after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation.	Section 18 report.
The Lebanon (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1124)	14 th October 2020	To extend with modifications The Lebanon (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/612) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (Overseas Territories) (Amendment) Order 2020 (S.I. 2020/1582).

[Statutory guidance](#) for this regime was published on 1st December 2020.

xv. Lebanon (Assassination of Rafiq Hariri and others)

Name	Date made	Purpose	Statutory Report(s)
The Lebanon (Sanctions) (Assassination of Rafiq Hariri and others) (EU Exit) Regulations 2020 (S.I. 2020/617)	18 th June 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolution 1636 (2005) after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation.	Section 18 report.
The Lebanon (Sanctions) (Assassination of Rafiq Hariri and others) (Overseas Territories) Order 2020 (S.I. 2020/1282)	11 th November 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Lebanon (Sanctions) (Assassination of Rafiq Hariri and others) (EU Exit) Regulations 2020 (S.I. 2020/617) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAML A (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 3(a) of UN Security Council Resolution 1636 (2005) in relation to any persons named by the UN Security Council Committee established by that Resolution.	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 3rd November 2020 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

xvi. Libya

Name	Date made	Purpose	Statutory Report(s)
The Libya (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/1665)	29 th December 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolutions 1970 (2011), 1973 (2011) and 2146 (2014) after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation, and to ensure that the UK can operate an effective and autonomous sanctions regime in relation to Libya.	Section 2(4) report and section 18 report .
The Libya (Sanctions) (Overseas Territories) Order 2021 (S.I. 2021/37)	13 th January 2021	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Libya (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/1665) as amended from time to time (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAML A (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed	

		by paragraph 15 of UN Security Council Resolution 1970 (2011).	
The Libya (Sanctions) (Overseas Territories) (Amendment) Order 2023 (S.I. 2023/656)	14 th June 2023	To amend The Libya (Sanctions) (Overseas Territories) Order 2021 (S.I. 2021/37) and to extend with modifications The Libya (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/1665) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions through their own domestic legislation).	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 3rd November 2020 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121). Separately, OFSI has published [financial sanctions guidance](#) for this regime.

xvii. Mali

Name	Date made	Purpose	Statutory Report(s)
The Mali (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/705)	7 th July 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolution 2374 (2017) after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation, and to ensure that the UK can operate an effective and autonomous sanctions regime in relation to Mali.	Section 2(4) report and section 18 report .
The Mali (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1591)	16 th December 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar) The Mali (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/705) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAMLA (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 1 of UN Security Council Resolution 2374 (2017) in relation to persons designated by the Security Council or its Committee under paragraphs 8 and 9 of that Resolution.	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 5) Regulations 2020 (S.I. 2020/1397);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 30th November 2020 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

xviii. Myanmar

Name	Date made	Purpose	Statutory Report(s)
The Burma (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/136) (revoked)	29 th January 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Burma after end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Burma that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Burma (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1264) (revoked) ⁸¹	11 th November 2020	To extend with modifications The Burma (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/136) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	
The Myanmar (Sanctions) Regulations 2021 (S.I. 2021/496)	26 th April 2021	To establish a UK autonomous sanctions regime in respect of Myanmar comprising financial, immigration and trade sanctions, replacing the existing sanctions regime established by The Burma (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/136).	Section 2(4) report and section 18 report .

⁸¹ The Burma and Somalia (Sanctions) (Overseas Territories) (Amendment) Order 2018 (S.I. 2018/1351) (revoked) was not made using SAML powers and is not listed here.

The Myanmar (Sanctions) (Overseas Territories) Order 2021 (S.I. 2021/528)	28 th April 2021	To extend with modifications The Myanmar (Sanctions) Regulations 2021 (S.I. 2021/496) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	
The Myanmar (Sanctions) (Isle of Man) Order 2021 (S.I. 2021/529)	28 th April 2021	To extend to the Isle of Man with modifications The Myanmar (Sanctions) Regulations 2021 (S.I. 2021/496) as amended from time to time.	

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 29th April 2021.

xix. Nicaragua

Name	Date made	Purpose	Statutory Report(s)
The Nicaragua (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/610)	18 th June 2020	To ensure that the UK continues to operate an effective sanctions regime in relation to Nicaragua after the end of the Transition Period, replacing with a similar effect the EU sanctions regime relating to Nicaragua that was previously in force under EU legislation and related UK Regulations.	Section 2(4) report and section 18 report .
The Nicaragua (Sanctions) (Overseas Territories) (No. 2) Order 2020 (S.I. 2020/1269) ⁸²	11 th November 2020	To extend with modifications The Nicaragua (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/610) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 3rd November 2020.

⁸² The Nicaragua (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/279) (revoked) was not made using SAMLA powers and is not included here.

xx. Russia

Name	Date made	Purpose	Statutory Report(s)
The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855)	10 th April 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Russia after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Russia that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Russia (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1571)	16 th December 2020	To extend with modifications The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	
The Russia (Sanctions) (Overseas Territories) (Amendment) Order 2021 (S.I. 2021/288)	10 th March 2021	To make amendments to The Russia (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1571) and to extend with modifications The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2022 (S.I. 2022/123)	10 th February 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to broaden the definition of “involved person” in the criteria which give grounds for a person to be designated.	Section 46 report.
The Russia (Sanctions) (EU Exit) (Amendment) (No. 2) Regulations 2022 (S.I. 2022/194)	28 th February 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new financial sanctions measures and amend existing financial sanctions measures.	Section 18 report and section 46 report.
The Russia (Sanctions) (EU Exit) (Amendment) (No. 3) Regulations 2022 (S.I. 2022/195)	28 th February 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new trade sanctions measures and amend existing trade sanctions measures.	Section 18 report and section 46 report.
The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2022 (S.I. 2022/203)	1 st March 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new shipping sanctions measures.	Section 18 report and section 46 report.
The Russia (Sanctions) (EU Exit) (Amendment) (No. 5) Regulations 2022 (S.I. 2022/205)	1 st March 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce a new financial sanctions measure.	Section 18 report and section 46 report.
The Russia (Sanctions) (EU Exit) (Amendment) (No. 6) Regulations 2022 (S.I. 2022/241)	8 th March 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new aircraft and trade sanctions measures, and to amend the 2019 Regulations to correct certain omissions	Section 18 report and section 46 report.

		and an error in the shipping measures introduced by The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2022 (S.I. 2022/203).	
<u>The Russia (Sanctions) (EU Exit) (Amendment) (No. 7) Regulations 2022 (S.I. 2022/395)</u>	29 th March 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855), introducing a power to designate persons by description, extending existing finance, trade and shipping sanctions measures in relation to Crimea and the city of Sevastopol to the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine, introducing prohibitions on technical assistance relating to aircraft and ships, extending the scope of existing circumvention prohibitions, and resolving issues including the correction of errors arising from recent amendments to other Russia sanctions Regulations.	
<u>The Russia (Sanctions) (EU Exit) (Amendment) (No. 8) Regulations 2022 (S.I. 2022/452)</u>	13 th April 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new trade sanctions measures and amend existing trade sanctions measures.	

The Russia (Sanctions) (Overseas Territories) (Amendment) Order 2022 (S.I. 2022/453)	13 th April 2022	To amend The Russia (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1571) and to extend with modifications The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions through their own domestic legislation).	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 9) Regulations 2022 (S.I. 2022/477)	27 th April 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new trade sanctions measures relating to internet access services, online social media services and application stores.	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 10) Regulations 2022 (S.I. 2022/689) (revoked)	20 th June 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new trade sanctions measures.	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 11) Regulations 2022 (S.I. 2022/792)	12 th July 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855), revoking and replacing The Russia (Sanctions) (EU Exit) (Amendment) (No. 10) Regulations 2022 (S.I. 2022/689) which introduced new trade sanctions measures.	

The Russia (Sanctions) (EU Exit) (Amendment) (No. 12) Regulations 2022 (S.I. 2022/801)	14 th July 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855), to introduce a new financial sanctions measure banning additional types of new investments, and services related to those investments, in relation to Russia by United Kingdom persons or other persons in the UK for the purposes set out in regulation 4 of the 2019 Regulations.	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 13) Regulations 2022 (S.I. 2022/814)	14 th July 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855), amending the designation criteria to specify additional activities for which a person may be designated, expanding the scope of those involved in obtaining a benefit from or supporting the Government of Russia, and broadening the definition of “associated with” to include specified family members, and to introduce a humanitarian exception from trade sanctions measures to support humanitarian assistance activity in the non-government controlled areas of Donetsk and Luhansk oblast, and to correct or resolve a number of issues arising from the 2019 Regulations or amendments made to them.	
The Russia (Sanctions) (Overseas Territories)	19 th July 2022	To amend The Russia (Sanctions) (Overseas Territories) Order 2020 (S.I.	

(Amendment) (No. 2) Order 2022 (S.I. 2022/843)		2020/1571) and to extend with modifications The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions through their own domestic legislation).	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 14) Regulations 2022 (S.I. 2022/850)	18 th July 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new trade sanctions measures and amend existing restrictions on trade with Russia.	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 15) Regulations 2022 (S.I. 2022/1110)	26 th October 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new trade sanctions measures.	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 16) Regulations 2022 (S.I. 2022/1122)	1 st November 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce a new trade sanctions measure to ban the supply or delivery by ship of 2709 and 2710 oil and oil products from a place in Russia to a third country, or from one third country to another third country, as well as the provision of related ancillary services (including brokering services and financial assistance).	

The Russia (Sanctions) (Overseas Territories) (Amendment) (No. 3) Order 2022 (S.I. 2022/1167)	9 th November 2022	To amend The Russia (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1571) and to extend with modifications The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions through their own domestic legislation).	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 17) Regulations 2022 (S.I. 2022/1331)	14 th December 2022	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce a new trade sanctions measure banning the provision of trust services to or for the benefit of designated persons and persons connected with Russia, and to amend existing restrictions on trade with Russia.	
The Russia (Sanctions) (Overseas Territories) (Amendment) (No. 4) Order 2022 (S.I. 2022/1338)	14 th December 2022	To amend The Russia (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1571) and to extend with modifications The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions through their own domestic legislation).	

The Russia (Sanctions) (Overseas Territories) (Amendment) Order 2023 (S.I. 2023/291)	8 th March 2023	To amend The Russia (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1571) and to extend with modifications The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions through their own domestic legislation).	
The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2023 (S.I. 2023/440)	18 th April 2023	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new trade sanctions measures and amend existing trade sanctions measures.	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 2) Regulations 2023 (S.I. 2023/665)	15 th June 2023	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855), adding a new purpose to the 2019 regulations to establish a clearer legislative basis to enable certain assets to remain frozen/immobilised until Russia pays compensation to Ukraine for the damage it has caused, and extending existing finance, shipping and trade sanctions relating to non-government controlled Ukrainian territory (the Autonomous Republic of Crimea and city of Sevastopol and the non-government controlled areas of the Donetsk and Luhansk oblasts) to the	

		non-government controlled areas of the Kherson and Zaporizhzhia oblasts of Ukraine.	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 3) Regulations 2023 (S.I. 2023/713)	27 th June 2023	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce a new trade sanctions measure relating to the provision of legal advisory services.	
The Russia (Sanctions) (Overseas Territories) (Amendment) (No. 2) Order 2023 (S.I. 2023/846)	19 th July 2023	To amend The Russia (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1571) and to extend with modifications The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions through their own domestic legislation).	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023 (S.I. 2023/1364)	12 th December 2023	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce new restrictions on trade and financial measures.	
The Russia (Sanctions) (EU Exit) (Amendment) (No. 5) Regulations 2023 (S.I. 2023/1367)	12 th December 2023	To amend The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) to introduce a prohibition on the import, acquisition, and supply and delivery of the import of diamonds originating or consigned from Russia including related ancillary services.	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 9th May 2019 and has been updated numerous times to reflect legislative developments. [Guidance on providing professional and business services to a person connected with Russia](#) was published on 2nd December 2022 and was updated twice in 2023 and a [Common High Priority Items list](#) was published on 30th May 2023 and subsequently updated in September 2023.

See the case study in [section 10](#) of this memorandum for more information.

xxi. Somalia

Name	Date made	Purpose	Statutory Report(s)
The Somalia (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/642)	25 th June 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolutions 733 (1992), 1844 (2008), 2036 (2012) and 2498 (2019) after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation, and to ensure that the UK continues to operate an effective and autonomous sanctions regime in relation to Somalia.	Section 2(4) report and section 18 report .
The Somalia (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1285) ⁸³	11 th November 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Somalia (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/642) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAMLA (with suitable modifications and for the purposes of the	

⁸³ The Burma and Somalia (Sanctions) (Overseas Territories) (Amendment) Order 2018 (S.I. 2018/1351) (revoked) and The Somalia (Sanctions) (Overseas Territories) (Amendment) Order 2020 (S.I. 2020/282) (revoked) were not made using SAMLA powers and are not listed here.

		modified Regulations), and to implement in those territories the travel ban imposed by paragraph 1 of UN Security Council Resolution 1844 (2008) in relation to any persons designated by the UN Sanctions Committee.	
The Somalia (Sanctions) (EU Exit) (Amendment) Regulations 2021 (S.I. 2021/823)	8 th July 2021	To amend The Somalia (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/642) to correct errors in those Regulations.	Section 18 report and section 46 report .

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 31st December 2020 and was updated in 2023 to reflect UN and legislative developments.

xxii. South Sudan

Name	Date made	Purpose	Statutory Report(s)
The South Sudan (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/438)	4 th March 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to South Sudan after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to South Sudan that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The South Sudan (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1287)	11 th November 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar) The South Sudan (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/438) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAML A (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 9 of UN Security Council Resolution 2206 (2015) in relation to persons designated by the	

		Security Council or its Committee under paragraph 16 of that Resolution.	
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See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2020 (S.I. 2020/591);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 12th April 2019 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

xxiii. Sudan

Name	Date made	Purpose	Statutory Report(s)
The Sudan (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/753)	16 th July 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolutions 1556 (2004), 1591 (2005), 1672 (2006) and 2035 (2012) after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation, and to ensure that the UK can operate an effective and autonomous sanctions regime in relation to Sudan.	Section 2(4) report and section 18 report .
The Sudan (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1592)	16 th December 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar) The Sudan (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/753) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAML A (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 3(d) of UN Security Council Resolution 1591 (2005) in relation to persons designated by the Security	

		Council or its Committee under paragraph 3(c) of that Resolution.	
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See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);
- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

[Statutory guidance](#) for this regime was published on 31st December 2020 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

xxiv. Syria

Name	Date made	Purpose	Statutory Report(s)
The Syria (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/792)	3 rd April 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Syria after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Syria that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Syria (Sanctions) (Overseas Territories) Order 2020 (2020/1580)	16 th December 2020	To extend with modifications The Syria (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/792) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 11th March 2020.

xxv. Syria Cultural Property

Name	Date made	Purpose	Statutory Report(s)
The Syria (United Nations Sanctions) (Cultural Property) (EU Exit) Regulations 2020 (S.I. 2020/1233)	5 th November 2020	To replace the relevant existing EU legislation and related UK legislation by which the UK's obligations under paragraph 17 of UN Security Council Resolution 2199 (2015) are given effect in domestic law, to ensure that the UK continues to meet its obligations under paragraph 17 of that resolution after the end of the Transition Period.	Section 18 report.
The Syria (United Nations Sanctions) (Cultural Property) (Overseas Territories) Order 2020 (S.I. 2020/1562)	16 th December 2020	To extend with modifications The Syria (United Nations Sanctions) (Cultural Property) (EU Exit) Regulations 2020 (S.I. 2020/1233) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42).

[Statutory guidance](#) for this regime was published on 31st December 2020.

xxvi. Venezuela

Name	Date made	Purpose	Statutory Report(s)
The Venezuela (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/135)	29 th January 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Venezuela after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Venezuela that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Venezuela (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1262) ⁸⁴	11 th November 2020	To extend with modifications The Venezuela (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/135) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

[Statutory guidance](#) for this regime was published on 31st January 2019. See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

⁸⁴ The Venezuela (Sanctions) (Overseas Territories) Order 2018 (S.I. 2018/179) was not made using SAML powers and is not listed here.

xxvii. Yemen

Name	Date made	Purpose	Statutory Report(s)
The Yemen (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/733) (revoked)	9 th July 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolutions 2140 (2014) and 2216 (2015) after the end of the Transition Period, by replacing with substantially the same effect relevant existing EU legislation and related UK legislation, and to ensure that the UK can operate an effective and autonomous sanctions regime in relation to Yemen.	Section 2(4) report and section 18 report .
The Yemen (Sanctions) (EU Exit) (No. 2) Regulations 2020 (S.I. 2020/1278)	12 th November 2020	To ensure that the UK continues to meet its obligations under UN Security Council Resolutions 2140 (2014) and 2216 (2015) after the end of the Transition Period, replacing with substantially the same effect the relevant existing EU legislation and related UK legislation, and to ensure the UK can operate an effective and autonomous sanctions regime in relation to Yemen. NB: This instrument replaces The Yemen (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/733) which were revoked on the basis of doubtful vires in relation to immigration sanctions. This instrument therefore makes the	Section 2(4) report and section 18 report .

		same provision as those regulations with the addition of a direct reference to section 4 of SAMLA in its preamble.	
The Yemen (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1589)	16 th December 2020	To extend to all British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements) The Yemen (Sanctions) (EU Exit) (No. 2) Regulations 2020 (S.I. 2020/1278) (with the modifications required to enable implementation and enforcement of the sanctions regime by the authorities in those territories) and sections 44, 52(3) and 53 of SAMLA (with suitable modifications and for the purposes of the modified Regulations), and to implement in those territories the travel ban imposed by paragraph 15 of UN Security Council Resolution 2140 (2014) in relation to persons designated by the Sanctions Committee established in accordance with paragraph 19 of that Resolution.	

[Statutory guidance](#) for this regime was published on 31st December 2019 and was updated on 9th February 2023 to reflect provisions of The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121). See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42);
- The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819);

- The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121).

xxviii. Zimbabwe

Name	Date made	Purpose	Statutory Report(s)
The Zimbabwe (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/604)	19 th March 2019	To ensure that the UK continues to operate an effective sanctions regime in relation to Zimbabwe after the end of the Transition Period, replacing with substantially the same effect the EU sanctions regime relating to Zimbabwe that was previously in force in the UK under EU legislation and related UK legislation.	Section 2(4) report and section 18 report .
The Zimbabwe (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1272)	11 th November 2020	To extend with modifications The Zimbabwe (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/604) as amended from time to time to all British Overseas Territories except Bermuda and Gibraltar (which implement sanctions under their own legislative arrangements).	

See also in [section \(c\) of this Annex](#):

- The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627);
- ;The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2020 (S.I. 2020/590);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951);
- The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818).

[Statutory guidance](#) for this regime was published on 3rd May 2019.

c) Cross-cutting regulations relating to SAMLA's sanctions provision

Name	Date made	Purpose	Statutory Report(s)
The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 1) Regulations 2018 (S.I. 2018/1213) (C. 85)	21 st November 2018	To bring into force certain provisions of SAMLA.	
The Sanctions Review Procedure (EU Exit) Regulations 2018 (S.I. 2018/1269)	27 th November 2018	To set out the procedure for requesting a review of sanctions designations and ship specifications under SAMLA.	
The Civil Procedure (Amendment) (EU Exit) Rules 2019 (2019/147) (L.2)	30 th January 2019	To set out the procedure for court reviews in England and Wales against sanctions decisions made under SAMLA and to amend the Civil Procedure Rules so that the government can apply to the court for sensitive material to be disclosed only to special advocates and the court on the basis of this being in the public interest.	
Rules of the Court of Judicature (Northern Ireland) (Amendment) (EU Exit) 2019 (S.R. 2019/8)	30 th January 2019	To set out the procedure for court reviews in Northern Ireland against sanctions decisions made under SAMLA and to amend the Rules of the Court of Judicature (Northern Ireland) so that the government can apply to the court for sensitive material to be disclosed only to	

		special advocates and the court on the basis of this being in the public interest.	
Act of Sederunt (Rules of the Court of Session 1994 Amendment) (Sanctions and Anti-Money Laundering) 2019 (S.S.I. 2019/72)	26 th February 2019	To extend the application of Chapter 96 of the Rules of the Court of Session 1994 to sanctions proceedings under SAMLA.	
Act of Sederunt (Rules of the Court of Session 1994 Amendment) (Sanctions and Anti-Money Laundering) (No.2) 2019 (S.S.I. 2019/97)	19 th March 2019	To amend the Act of Sederunt (Rules of the Court of Session 1994 Amendment) (Sanctions and Anti-Money Laundering) 2019 to insert provision to revoke Chapter 101 of the Rules of the Court of Session 1994 which should have been included in that Act of Sederunt.	
The Sanctions Regulations (Commencement No. 1) (EU Exit) Regulations 2019 (S.I. 2019/627)	21 st March 2019	To bring into force the provisions of certain sanctions regulations which have been made under section 1 of SAMLA.	
The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2019 (S.I. 2019/843)	10 th April 2019	To correct minor errors (including errors identified by the Joint Committee on Statutory Instruments) in a range of sanctions regulations.	⁸⁵
The Sanctions (EU Exit) (Miscellaneous Amendments)	11 th June 2020	To make corrections and amendments to a range of sanctions regulations, and to make revocations and amendments	Section 18 report and section 46 report .

⁸⁵ In September 2020, the government made a [written statement to Parliament](#) pursuant to section 57 of SAMLA to address an administrative oversight which had meant that the report required by Section 46 of SAMLA for these regulations had not been laid before Parliament.

(No. 2) Regulations 2020 (S.I. 2020/590)		which are consequential on the provisions in those sanctions Regulations.	
The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2020 (S.I. 2020/591)	11 th June 2020	To make corrections and amendments to a range of sanctions regulations, and to make revocations and amendments which are consequential on the provisions in those sanctions Regulations.	Section 46 report.
The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 3) Regulations 2020 (S.I. 2020/950)	3 rd September 2020	To make corrections and amendments to a range of sanctions regulations.	Section 46 report.
The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 4) Regulations 2020 (S.I. 2020/951)	3 rd September 2020	To make corrections and amendments to a range of sanctions regulations.	Section 46 report.
The Immigration (Persons Designated under Sanctions Regulations) (EU Exit) Regulations 2020 (S.I. 2020/1101)	9 th October 2020	To ensure that the process for considering a human rights or protection claim is retained for those subject to new autonomous travel bans and is not conflated with the review and challenge mechanisms for the sanctions themselves.	
The Sanctions (EU Exit) (Consequential Provisions) (Amendment) Regulations 2020 (S.I. 2020/1289)	12 th November 2020	To amend a range of sanctions regulations to include in those regulations a number of amendments to primary and secondary legislation,	

		consequential on those regulations coming into force.	
The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 5) Regulations 2020 (S.I. 2020/1397)	1 st December 2020	To make amendments and corrections to a range of sanctions regulations.	Section 46 report.
The Sanctions Regulations (EU Exit) (Commencement) Regulations 2020 (S.I. 2020/1514) (C. 42)	10 th December 2020	To bring into force the provisions of certain regulations which have been made under Part 1 of SAMLA.	
The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 2) Regulations 2020 (S.I. 2020/1535) (C.43)	14 th December 2020	To bring into force certain provisions of SAMLA.	
The Sanctions (Overseas Territories) (Amendment) Order 2020 (S.I. 2020/1582)	16 th December 2020	To amend The Global Human Rights Sanctions (Overseas Territories) Order 2020 (S.I. 2020/773) in order to revise the modifications to be made to The Global Human Rights Sanctions Regulations 2020 (S.I. 2020/680) in their extension to the British Overseas Territories (except Bermuda and Gibraltar, which implement sanctions under their own legislative arrangements), and to amend The Lebanon (Sanctions) (Overseas Territories) Order 2020 (S.I. 2020/1124)	

		in order to revise the modifications to be made to The Lebanon (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/612) in their extension to the British Overseas Territories (except Bermuda and Gibraltar).	
The Sanctions and Anti-Money Laundering Act 2018 (Commencement No. 3) Regulations 2021 (S.I. 2021/628) (C. 26)	26 th May 2021	To bring into force paragraph 8(4) of Schedule 3 to SAMLA.	
The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2022 (S.I. 2022/818)	14 th July 2022	To amend and correct a range of sanctions regulations, and to introduce financial sanctions measures (insofar as this instrument amends certain provisions relating to licences).	
The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2022 (S.I. 2022/819)	14 th July 2022	To amend and correct a range of sanctions regulations.	
The Sanctions (Damages Cap) Regulations 2022 (S.I. 2022/1092)	25 th October 2022	To specify an amount for damages pursuant to section 39(2A) of SAMLA which cannot be exceeded, as provided for in section 64 of the 2022 Act.	
The Immigration (Persons Designated under Sanctions Regulations) (EU Exit)	21 st December 2022	To remove the exemption from the effect of an immigration sanction applying to people who are lawfully in the UK when designated if a person leaves the UK.	

(Amendment) Regulations 2022 (S.I. 2022/1394)			
The Sanctions (Humanitarian Exception) (Amendment) Regulations 2023 (S.I. 2023/121)	6 th February 2023	<p>To make amendments to a range of sanctions regulations, giving effect to the UK's obligations under UN Security Council Resolution 2664 (2022) and creating a humanitarian exception across the relevant sanctions regimes whereby certain activities necessary for the delivery of humanitarian assistance or to support basic human needs, when carried out by specified organisations, do not violate UN asset freezes.</p>	

d) Statutory instruments relating to SAMLA's anti-money laundering provision

Title	Date Made	Purpose
<u>The Money Laundering and Terrorist Financing (Amendment) (High-Risk Countries) Regulations 2021 (S.I. 2021/392)</u>	24 th March 2021	To amend the definition of high-risk countries for purposes of enhanced due diligence to refer to a standalone list in the MLRs.
<u>The Money Laundering and Terrorist Financing (Amendment) (No.2) (High-Risk Countries) Regulations 2021 (S.I. 2021/827)</u>	12 th July 2021	To amend the list of high-risk countries in the MLRs.
<u>The Money Laundering and Terrorist Financing (Amendment) (No.3) (High-Risk Countries) Regulations 2021 (S.I. 2021/1218)</u>	1 st November 2021	To amend the list of high-risk countries in the MLRs.
<u>The Money Laundering and Terrorist Financing (Amendment) Regulations 2022 (S.I. 2022/137)</u>	14 th February 2022	To amend time limits for registration of trusts in the MLRs, and to add further exclusions to the trusts required to register.
<u>The Money Laundering and Terrorist Financing (High-Risk Countries) (Amendment) Regulations 2022 (S.I. 2022/393)</u>	28 th March 2022	To amend the list of high-risk countries in the MLRs.
<u>The Money Laundering and Terrorist Financing (High-Risk Countries) (Amendment) (No.2) Regulations 2022 (S.I. 2022/782)</u>	11 th July 2022	To amend the list of high-risk countries in the MLRs.

<u>The Money Laundering and Terrorist Financing (Amendment) (No.2) Regulations 2022 (S.I. 2022/860)</u>	21 st July 2022	To amend the MLRs with a broad range of measures including introducing the cryptoasset “travel rule”, rules around ‘change in control’ of regulated entities, and a new requirement to conduct assessments of proliferation financing risk.
<u>The Money Laundering and Terrorist Financing (High-Risk Countries) (Amendment) (No.3) Regulations 2022 (S.I. 2022/1183)</u>	14 th November 2022	To amend the list of high-risk countries in the MLRs.
<u>The Money Laundering and Terrorist Financing (High-Risk Countries) (Amendment) Regulations 2023 (2023/704)</u>	26 th June 2023	To amend the list of high-risk countries in the MLRs.
<u>The Money Laundering and Terrorist Financing (High-Risk Countries) (Amendment) (No. 2) Regulations 2023 (S.I. 2023/1306)</u>	4 th December 2023	To amend the list of high-risk countries in the MLRs.
<u>The Money Laundering and Terrorist Financing (Amendment) Regulations 2023 (S.I. 2023/1371)</u>	13 th December 2023	To amend the requirements for enhanced due diligence on politically exposed persons.

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