

**Mailwisseling tussen Paulus Houthuijs en Roberta Verbanca (Europese Commissie) tussen 23 en 25 januari 2023:**

Dear Paulus,

Please see below our replies, to be used on background:

Without commenting on individual cases, as you point out, EU sanctions with respect to semiconductors and other electronic components have been tightened progressively, with the most far-reaching controls adopted as part of the 8th and 9th package (respectively, 6 October and 16 December 2022). It is unclear from your request whether the findings refer to exports prohibited under sanctions at the time of their export or not. EU sanctions on electronic components are currently very broad and cover the great majority of electronic components found in Russian weapon systems when exported to Russia or for use in Russia.

As regards the enforcement of sanctions, it is for Member States to implement and enforce sanctions. The Commission monitors sanctions' implementation and enforcement by Member States. If a covered item exported from the EU to a third country is re-exported to Russia, the competent authorities may consider the EU exporter's failure to conduct adequate due diligence as a breach of the Sanctions Regulation. If the EU exporter knowingly and intentionally fails to conduct such due diligence, this can be considered as participation in a circumvention scheme.

Please also note that as part of the 8th package (6 October 2022), the EU has introduced a new listing criterion, which allows the listing of entities that facilitate the circumvention of EU sanctions. Additionally, the recent set of EU sanctions against Iran (as set out in Regulation 2022/2428) targeted several persons and entities involved in the supply of drones to Russia for use in Ukraine. On 13 December 2022, the Commission has appointed an International Special Envoy for the Implementation of EU Sanctions.

Let us know should you have any follow-up questions.

Best regards,

Roberta

*\* The information contained in this mail cannot be quoted in my name \**

**Roberta Verbanac**

**Supporting press officer for trade**

**European Commission**

Spokesperson's Service

Tel:

BERL 03/285, 200 Rue de la Loi, B-1049 Brussels, Belgium

**From:** VERBANAC Roberta (COMM)

**Sent:** Monday, January 23, 2023 12:18 PM

**To:** Paulus Houthuijs

**Cc:**

**Subject:** RE: Urgent media request by Dutch public broadcaster NOS

Dear Paulus,

Thank you for your questions. This is to confirm that we are working on the replies and we will get back to you.

Best regards,

Roberta

**Roberta Verbanac**

**Supporting press officer for trade**

**European Commission**

Spokesperson's Service

BERL 03/285, 200 Rue de la Loi, B-1049 Brussels, Belgium

**From:** Paulus Houthuijs  
**Sent:** Monday, January 23, 2023 10:11 AM  
**To:** MANOURY Charles (COMM)  
**Subject:** Urgent media request by Dutch public broadcaster NOS

Good morning Mr. Manoury,

We talked last week on the phone, sorry it took longer than I planned to e-mail you.

As we just discussed last week: me and a colleague have investigated the flow of semiconductors/microchips to Russia. We want to give the European Commission the opportunity to respond to our findings and subsequent questions. The information is not to be passed on to other people, parties or governments.

Please confirm per e-mail that you have received my request. Please answer as short as possible, per question.

Our questions:

- Through trade data we found out that, from three Dutch companies alone, many millions of semiconductors have been exported to Russia since the invasion of Ukraine. As far as we can see not directly, but through third countries like China. This is happening despite the EU-sanctions against Russia. Note: we're talking about semiconductors made by companies based in the Netherlands, but we don't know how many of the exported chips were made in the EU, or in production facilities outside the EU.
- What is your response to these findings?
- Since October the export of semiconductors to Russia is forbidden by EU-sanction. How many exporters in third countries have been sanctioned, or have been blacklisted by the European Commission?

- Companies like Sinno Electronics Limited (sanctioned by the US), Sigma Technology Limited and Maxtronic Global Limited were mentioned in the August rapport by RUSI (Silicon Lifeline) as important providers for companies linked to the Russian military. (<https://rusi.org/explore-our-research/publications/special-resources/silicon-lifeline-western-electronics-heart-russias-war-machine>) What actions have been taken against these companies by the European Commission?
- Why have they not yet been sanctioned, or been blacklisted?
- Are some microchips still allowed to go to Russia from the EU, without the requirement of a permit?

We will weigh your answers by relevance and process your answers in our reporting; your written reply will be published as a whole online, in addition to our publication. The deadline for your response is midday Wednesday, the 25th of January. If that's really not possible then we can discuss this point.

Thank you very much for your cooperation.

Kinds regards,

**Paulus Houthuijs**

Journalist / Web Editor

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