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OUTCOME OF PROCEEDINGS

From:	General Secretariat of the Council
To:	Delegations
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Subject:	Summary of discussions of the Foreign Relations Counsellors/Sanctions formation Working Party meeting held on 11 October 2017

DOCUMENT PARTIALLY ACCESSIBLE TO THE PUBLIC (14.03.2023)

1. Rosneft Judgment

DELETED

2. Humanitarian impact of EU restrictive measures

Commission informed that the Frequently Asked Questions for Syria were published on 1 September in all languages, concluding a process of extensive consultations with Member States, NGOs and financial institutions. **DELETED**

Work on this important subject will continue, both on the FAQs for DPRK and on identifying horizontal elements for Best Practices.

3. Indirect financing

Following a presentation of a joint **DELETED** paper under AOB in the meeting on 18 July, the group continued examination of the issue of indirect financing. **DELETED**

4. Online system for due-diligence

The Dutch Central Bank (DNB), as the regulatory authority for the implementation of sanctions on the national level, introduced members of the Netherlands Insurance Exchange Association (VNAB) who presented the ‘Sanctiepl@tform’, an on-line platform for exchange of information developed in common by its members. The platform serves primarily as a tool performing checks of compliance of concrete transactions and customers against applicable measures imposed by the EU as well as the United States. The platform has proven to be a reliable and cost-effective solution ensuring level-playing field of companies that developed it. It has been up and running for 2 years, but has to be seen as a result of long-term close cooperation between the members of the association.

5. Treatment of homonyms

The text proposed for inclusion into the Best Practices needs some fine-tuning before agreement on it could be reached, notably appropriate introductory wording to make fit the new elements into the rest of the Best Practices **DELETED**

The Group will revert to this issue in its next meeting on the basis of updated wording for inclusion in Best Practices.

6. Aliases

Several issues were raised in relation to Commission's proposal for definition of strong and weak aliases to be included as paragraph 21a of the Sanctions Guidelines, **DELETED**

The Commission would welcome inputs for changes to its proposed text and will present a revised proposal in the next meeting.

7. Indirect ownership

DELETED

the Presidency invited interested delegations to continue contacts and expressed willingness to revert to it when it is ripe for discussion in the group.

8. A.O.B.

(a) Information sharing: The Commission informed that the reporting module of the FSOR was completed in mid September and can now be used for reporting in all regimes. 18 Member States are already using it for the regimes where reporting was initially available.

(b) Contact list: The Commission could share the list of focal points for FSOR with the delegations, as a possible contact list in competent national authorities for any sanctions related issue. Delegations required time to verify if this approach would be appropriate in different national contexts. Presidency concluded to revert to this point at one of the next meetings.

The next meeting of RELEX/Sanctions Formation will take place on 5 December.