### **Australian Sanctions Office**

#### **COMMON HIGH PRIORITY ITEMS FOR RUSSIA**

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This **Advisory** is produced by the Australian Sanctions Office (**ASO**) within the Department of Foreign Affairs and Trade (**DFAT**). It provides a list of certain items (known in other jurisdictions as the 'common high priority items') that are of particular significance to Russian military capabilities. Exporters and re-exporters (such as manufacturers, distributors, and resellers) as well as their service providers (such as financial institutions, logistics companies, transportation providers, and freight forwarders) should be aware of Russia's procurement efforts so that they may adopt appropriate measures to counteract sanctions risks.

#### **Background**

Items on the common high priority items list are targeted by Russia for procurement. Some of these items are designated in Australian sanctions law as 'export sanctioned goods' for Russia; principally this is goods whose Australian Harmonized Export Commodity Classification (AHECC) codes fall within heading 8207, or chapters 84 and 85 of the AHECC. In addition, the goods may also be 'export sanctioned goods' by virtue of being arms or related matériel for Russia, or because another definition of 'export sanctioned good' applies. It is an offence to supply, sell or transfer goods (that are export sanctioned goods in relation to Russia) to another person, and as a direct or indirect result the goods are transferred to Russia, for use in Russia, or for the benefit of Russia, without a permit.

Australian exporters and related service providers are generally obliged to take reasonable precautions and exercise due diligence to avoid contravening Australian sanctions law. Russia is seeking to circumvent sanctions to procure goods on the *common high priority items* list, exporters and related services providers should take reasonable precautions and exercise due diligence to ensure that supplying, selling or transferring listed goods to customers in non-sanctioned countries will not result in the goods being transferred to, for use in or for the benefit of Russia. Businesses should consider a range of scenarios that could lead to this result, such as intentional on-forwarding by an end-user who conceals their participation in Russian procurement, and diversion of goods intended for a legitimate end-user by intermediaries.

Businesses can use all items on the common high priority items collectively as a due diligence tool by analysing customer transaction data and developing profiles of high-risk customer activity or high-risk export corridors specific to the business. This may assist businesses to detect and avoid potential sanctions breaches and suspicious customers may be reported to the ASO before they occur.

Users should consider all applicable sanctions measures and seek independent legal advice when considering sanctions compliance risks. This document should only be used as a guide and should not be used as a substitute for legal advice. Users are responsible for ensuring compliance with sanctions laws. You should also consider whether your activities might engage other countries' sanctions laws.

### **Common High Priority Items**

Tier	AHECC	Description
1	8542.31	Electronic integrated circuits: Processors and controllers, whether or not combined with memories, convertors, logic circuits, amplifiers, clock and timing circuits, or other circuits
1	8542.32	Electronic integrated circuits: Memories
1	8542.33	Electronic integrated circuits: Amplifiers
1	8542.39	Electronic integrated circuits: Other
2	8517.62	Machines for the reception, conversion, and transmission or regeneration of voice, images or other data, including switching and routing apparatus
2	8526.91	Radar apparatus, radio navigational aid apparatus and radio remote control apparatus: Radio navigational aid apparatus
2	8532.21	Other fixed capacitors: Tantalum capacitors
2	8532.24	Other fixed capacitors: Ceramic dielectric, multilayer
2	8548.00	Electrical parts of machinery or apparatus, not specified or included elsewhere in chapter 85
3A	8471.50	Processing units other than those of subheading 8471.41 or 8471.49, whether or not containing in the same housing one or two of the following types of unit: Storage units, input units, output
3A	8504.40	Electrical transformers, static convertors (for example, rectifiers) and inductors; part thereof: Static convertors
3A	8517.69	Other apparatus for the transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless network
ЗА	8525.89	Television cameras, digital cameras and video camera recorders
3A	8529.10	Parts suitable for use solely or principally with the apparatus of headings 8524 to 8528; Antennas and antenna reflectors of all kinds; parts suitable for use therewith
3A	8529.90	Parts suitable for use solely or principally with the apparatus of headings 8524 to 8528: Other
3A	8536.69	Coaxial connectors; cylindrical multicontact connectors; rack and panel connectors; printed circuit connectors; ribbon or flat cable connectors; other

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Tier	AHECC	Description
3A	8536.90	Electrical apparatus for switching or protecting electrical circuit, or for making connections to or in electrical circuits: Other apparatus
ЗА	8541.10	Diodes, other than photosensitive or light-emitting diodes
ЗА	8541.21	Transistors, other than photosensitive, with a dissipation rate of less than 1W
ЗА	8541.29	Transistors, other than photosensitive, Nesoi
ЗА	8541.30	Thyristors, diacs and triacs, other than photosensitive devices
ЗА	8541.49	Photosensitive semiconductor devices: Other
3A	8541.51	Semiconductor-based transducers
ЗА	8541.59	Semiconductor devices, Nesoi
3A	8541.60	Mounted piezoelectric crystals
3B	8482.10	Ball bearings
3B	8482.20	Tapered roller bearings, including cone and tapered roller assemblies
3B	8482.30	Spherical roller bearings
3B	8482.50	Other cylindrical roller bearings, including cage and roller assemblies
3B	8807.30	Other parts of airplanes. Helicopters or unmanned aircraft
3B	9013.10	Lasers, other than laser diodes; other optical appliances and instruments: Telescopic sights for fitting to arms
3B	9013.80	Lasers, other than laser diodes; other optical appliances and instruments, Nesoi
3B	9014.20	Instruments and appliances for aeronautical or space navigation (other than compasses)
3B	9014.80	Other navigational instruments and appliances
4A	8471.80	Other units of automatic data processing machines
4A	8486.10	Machines and apparatus: For the manufacture of boules or wafers
4A	8486.20	Machines and apparatus: For the manufacture semiconductor devices or of electronic integrated circuits

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Tier	AHECC	Description
4A	8486.40	Machines and apparatus: For the manufacture or repair of masks and reticles; for assembling semiconductors devices; for lifting, handling, loading or unloading of semiconductor devices
4A	8534.00	Printed circuits
4A	8543.20	Signal generators
4A	9027.50	Other instruments and apparatus using optical radiations (ultraviolet, visible, infrared)
4A	9030.20	Oscilloscopes, spectrum analysers and other instruments and apparatus for measuring or checking electrical quantities: Oscilloscopes and oscillographs
4A	9030.32	Other instruments and apparatus, for measuring or checking voltage, current, resistance or power: Multimeters, with a recording device
4A	9030.39	Other instruments and apparatus, for measuring or checking voltage, current, resistance or power: Other, with a recording device
4A	9030.82	Oscilloscopes, spectrum analysers and other instruments and apparatus for measuring or checking electrical quantities: For measuring or checking semiconductor wafers or devices
4B	8457.10	Machining centres for working metal
4B	8458.11	Horizontal lathes, including turning centres, for removing metal, numerically controlled
4B	8458.91	Lathes (including turning centres) for removing metal, numerically controlled (excl. horizontal lathes)
4B	8459.61	Milling machines for metals, numerically controlled (excluding lathes and turning centres of heading 8458, way-type unit head machines, drilling machines, boring-milling machines, boring machines, and knee-type milling machines)
4B	8466.93	Parts and accessories suitable for use solely or principally with the machines of headings 8456 to 8461, not elsewhere specified.