



# PROHIBITIONS ON THE EXPORT OF GOODS AND PROVISION OF RELATED SERVICES TO RUSSIA AND SPECIFIED REGIONS OF UKRAINE

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## OVERVIEW

This guidance note details the restrictions on exporting certain goods to Russia and specified regions of Ukraine (Crimea, Sevastopol, Luhansk, and Donetsk) and sanctioned services relating to a sanctioned supply or associated activities. It also outlines the responsibilities of individuals and businesses to take reasonable precautions and exercise due diligence to ensure adherence to these export prohibitions.

## Glossary

Term	Definition
Arms or related matériel	Arms or related matériel generally includes weapons, ammunition, military vehicles and equipment, spare parts and accessories for any of those things, and paramilitary equipment.
Australian Sanctions Office	The Australian Sanctions Office (ASO) is the Australian Government's sanctions regulator. The ASO sits within the Department of Foreign Affairs and Trade (DFAT).
Australian Harmonized Export Commodity Classification (AHECC) codes.	The Australian Harmonized Export Commodity Classification (AHECC) is the product classification used to identify goods being exported from Australia. The AHECC is an extension of the <a href="#">Harmonized Commodity Description and Coding System</a> (Harmonized System, or HS). AHECC codes available on the <a href="#">Australian Bureau of Statistics website</a> .
Defence and Strategic Goods List	The <a href="#">Defence and Strategic Goods List (DSGL)</a> is the list that specifies the goods, software and technology that are regulated under Australian defence export control legislation. Goods on the DSGL may also be 'arms or related matériel' for sanctions purposes.
Regulated entity	A government agency, individual, business, or other organisation whose activities are subject to Australian sanctions laws.
Sanctions permit	A sanctions permit is an authorisation from the Minister for Foreign Affairs (or the Minister's delegate) to undertake an activity that would otherwise be prohibited by an Australian sanctions law.

## What are export-sanctioned goods and sanctioned services?

Under Australian sanctions law, it is prohibited to supply, sell or transfer certain goods ('export-sanctioned goods') to another person, with the direct or indirect result that the goods are transferred to, for the benefit of, or use in Russia or specified regions of Ukraine (Crimea, Sevastopol, Luhansk and Donetsk) ('sanctioned supply'). The purpose of these sanctions is to ensure that Australian goods are not supporting Russia's illegal and immoral invasion of Ukraine.

Australian sanctions law also prohibits the provision of certain services if it assists with, or is provided in relation to, the supply, sale or transfer of export-sanctioned goods to Russia or specified regions of Ukraine. Additionally, Australian sanctions law prohibits the provision of certain services to Russia or specified regions of Ukraine, or a person for use in those places. This includes services relating to the manufacture, maintenance or use of export-sanctioned goods in specified regions of Ukraine. The term 'services' could capture a broad range of activities including providing technical advice, assistance or training.

## What goods are export-sanctioned goods for Russia and specified regions of Ukraine?

The full list of export-sanctioned goods is detailed in the following legislation:

- [Autonomous Sanctions Regulations 2011](#)
- [Autonomous Sanctions \(Export Sanctioned Goods—Russia\) Designation 2022](#)
- [Autonomous Sanctions \(Export Sanctioned Goods—Specified Ukraine Regions\) Designation 2023](#)
- [Autonomous Sanctions \(Russia, Crimea and Sevastopol\) Specification 2015](#)

The legislation may be updated from time to time as additional categories of goods are added or removed. For example, on 25 October 2023 the 'Export Machinery Ban' was implemented by designating a wide range of goods for Russia and specified regions of Ukraine, including industrial and electrical machinery and equipment, tools, pumps and boilers. On 24 February 2025, unmanned aircraft (drones) and components of drones (AHECC headings 8806 and 8807) were also designated as export sanctioned goods for Russia and specified regions of Ukraine.

Most export-sanctioned goods in relation to Russia and specified regions of Ukraine are specified by reference to the Australian Harmonized Export Commodity Classification (AHECC) available on the [Australian Bureau of Statistics website](#). The table at **Appendix A** is provided as a handy reference to identify chapters of the AHECC which contain product codes that have been specified as export-sanctioned goods for Russia and specified regions of Ukraine as at 24 February 2025. Regulated entities (including manufacturers, exporters, brokers, distributors and freight forwarders) that deal in goods appearing in these chapters should consult the relevant legislative instrument to determine which products are export-sanctioned goods and in what circumstances. In addition to consulting this table, regulated entities should keep in mind that any good that meets the definition of 'arms and related matériel' is an export-sanctioned good for Russia regardless of AHECC code (see [Factsheet: Arms or Related Matériel](#) for further information).

## What do I need to do?

All regulated entities, including those that deal in goods that are specified as export-sanctioned for Russia and specified regions of Ukraine, and those that provide technical, financial and other services in relation to these goods, should **take reasonable precautions and exercise due diligence** to avoid sanctions contraventions. Importantly, sanctions offences are strict liability offences for bodies corporate (including corporate government agencies), meaning that it is not necessary to prove any fault element (intent, knowledge,

recklessness or negligence). Therefore, even if the goods are exported without the intention of supplying to an end-user in Russia or specified regions of Ukraine, the exporter may still be liable if the goods are ultimately transferred to Russia or a specified region of Ukraine. Exporters should be mindful that goods transferred to Russia or a specified region of Ukraine during transit is also prohibited, even where the final destination is in a non-sanctioned country or part of a country. The following section ('How can I mitigate sanctions risks?') provides further guidance.

In addition, regulated entities should **be aware** of Russia's attempts to procure Australian goods to support its war effort. For more information see: [Advisory Note – Australian export sector, Russian evasion methods](#).

## How can I mitigate sanctions risks?

It is a defence to a strict liability offence if a body corporate demonstrates it **took reasonable precautions and exercised due diligence** to avoid contravening sanctions laws.

In the sanctions context, reasonable precautions and due diligence are not defined terms but generally refer to the steps and measures a regulated entity must take to ensure it is not engaging in sanctioned activities. However, what is objectively 'reasonable' is highly context-dependent and can vary based on factors such as the size and nature of the business, the complexity of its transactions, and the specific geographic regions and sanctions regulations involved.

The focus of regulated entities should be to understand and manage the risk of contravening sanctions laws as effectively as possible. By understanding the risks that a regulated entity faces, it can develop more effective sanctions compliance procedures. This involves implementing robust internal policies, procedures, and controls that are tailored to the specific risks faced by the business. For example, regulated entities should regularly screen goods, customers, and partners for sanctions risks, ensure staff are well-trained, and keep their compliance procedures updated and regularly audited. Further, regulated entities should regularly monitor relevant legislation and the DFAT [website](#) to remain informed of any changes or updates to sanctions laws.

In the context of managing sanctions risks around export-sanctioned goods, regulated entities should include consideration of the following two factors:

- **The goods** – Regulated entities should be aware of the export prohibitions applicable to certain goods going to Russia and specified regions of Ukraine, or for use in, or for the benefit of those regions. You can see which goods are prohibited for export on the DFAT [website](#). The prohibitions may apply to parts of goods as well as assembled goods. You should remain aware of the relevant AHECC code descriptions that may be applicable to either.
- **The end-user** – If the end-user has links to Russia or specified regions of Ukraine, you should take steps to confirm that the goods will not ultimately be transferred to Russia or specified regions of Ukraine. Seeking assurances from end-users such as through end-user or end-use certificates will assist in remaining compliant with Australian sanctions laws.
- **The end use** – if the goods have an actual military end use, or a military end user, the goods are likely to be considered 'arms or related matériel', regardless of the nature of the goods, or whether they appear on the DSGL.

Sanctions compliance is an ongoing obligation rather than a one-time assessment. Sanctions measures and associated risks are constantly evolving, requiring regulated entities to continuously monitor and reassess their compliance strategies. Regulated entities are encouraged to seek independent legal advice tailored to their specific situations and ensure thorough due diligence in all activities.

For more information see:

- [Sanctions Compliance Toolkit](#)
- [Sanctions Risk Assessment](#)

## Sanctions permits

A sanctions permit is an authorisation from the Minister for Foreign Affairs (or the Minister's delegate) to undertake an activity that would otherwise be prohibited under Australian sanctions law. More detailed information on Australia's sanctions frameworks, including the specific criteria for granting permits under each framework, can be found on the DFAT [website](#).



### Penalties for sanctions offences

Sanctions offences are punishable by:

- For an individual - up to 10 years in prison and/or a fine of 2500 penalty units (\$825,000 as of 7 November 2024) or three times the value of the transaction(s) (whichever is the greater).
- For a body corporate – a fine of up to 10,000 penalty units (\$3.30 million as of 7 November 2024) or three times the value of the transaction(s) (whichever is the greater).

The offences are strict liability offences for bodies corporate, meaning that it is not necessary to prove any fault element (intent, knowledge, recklessness or negligence) for a body corporate to be found guilty. However, an offence is not committed if a body corporate can demonstrate that it took reasonable precautions, and exercised due diligence, to avoid contravening Australia's autonomous sanctions laws.



### Further information and Resources

Further information is available on the Department's [website](#) and in [ASO guidance notes](#) on specific sanctions topics. If you have any questions, you can make an enquiry through [Pax](#).

## APPENDIX A

### AHECC REFERENCES FOR EXPORT-SANCTIONED GOODS FOR RUSSIA AND SPECIFIED REGIONS OF UKRAINE

AHECC Chapter	AHECC Code of Export-Sanctioned Goods (Russia)	AHECC Code of Export-Sanctioned Goods (Specified Regions of Ukraine)	Description
01	01012100	N/A	Pure-bred horses
03	0306; 0307	N/A	Crustaceans and molluscs, including lobster and abalone
07	07095601	N/A	Truffles
16	16043100; 16043200	N/A	Caviar and caviar substitutes; in the case of caviar substitutes
20	20039000	N/A	Truffles
22	220410; 220421; 220422; 220429; 2205; 22060000; 2208	N/A	Wines (including sparkling wines), spirits and spirituous beverages
24	2401; 2402; 2403	N/A	Tobacco products
26	26060000	N/A	Aluminium ores and concentrates
28	28181000; 28182000; 28183000	N/A	Artificial corundum, Other aluminium oxide, Aluminium hydroxide
33	33030010; 33030090; 3304; 3307	N/A	Perfumes and toilet waters and cosmetics, including beauty and make-up products ( <b>exceeding \$500 per unit</b> )
40	40151920; 40159030	N/A	Articles and equipment for skiing, golf and water sports ( <b>exceeding \$500 per unit</b> )
42	42010000; 4202; 4203; 42050010	N/A	Leather, saddlery and travel goods, handbags and similar articles ( <b>exceeding \$500 per unit</b> )  Garments, clothing accessories and shoes (regardless of their material) articles ( <b>exceeding \$500 per unit</b> )
43	4301; 4302; 4303	N/A	Furs ( <b>exceeding \$500 per unit</b> )  Garments, clothing accessories and shoes (regardless of their material) articles ( <b>exceeding \$500 per unit</b> )
49	490700	N/A	Coins and banknotes, not being legal tender
57	Entire chapter	N/A	Carpets and Rugs ( <b>exceeding \$500 per unit</b> )
58	58050000	N/A	Tapestries and wall hangings ( <b>exceeding \$500 per unit</b> )
59	59050000	N/A	Tapestries and wall hangings ( <b>exceeding \$500 per unit</b> )
61	Entire chapter (including 61122001; 611231; 611239;	N/A	Garments, clothing accessories and shoes (regardless of their material) articles ( <b>exceeding \$500 per unit</b> )

	611241; 611249; 611300)		Articles and equipment for skiing, golf and water sports ( <b>exceeding \$500 per unit</b> )
62	Entire Chapter (including 62102003; 62103004; 62104004; 62105005; 62111100; 62111201; 62113201; 62113301; 62113991; 62114200; 62114300; 62114901)	N/A	Garments, clothing accessories and shoes (regardless of their material) articles ( <b>exceeding \$500 per unit</b> )  Articles and equipment for skiing, golf and water sports ( <b>exceeding \$500 per unit</b> )
64	6401; 6402; 6403; 6404; 6405; 640212; 64031200; 64041100; 64041900	N/A	Garments, clothing accessories and shoes (regardless of their material) articles ( <b>exceeding \$500 per unit</b> )  Articles and equipment for skiing, golf and water sports ( <b>exceeding \$500 per unit</b> )
65	65040000; 65050000; 650699	N/A	Garments, clothing accessories and shoes (regardless of their material) articles ( <b>exceeding \$500 per unit</b> )
66	66019100; 66019900; 66020000	N/A	Garments, clothing accessories and shoes (regardless of their material) articles ( <b>exceeding \$500 per unit</b> )
69	6911; 69120000; 6913; 6914	N/A	Tableware of porcelain, china, stone- or earthenware or fine pottery ( <b>exceeding \$500 per unit</b> )
70	70099100; 70099200; 7010; 70132210; 70133320; 70134122; 70139100; 70181000; 70189000; 70200090	N/A	Lead crystal glassware ( <b>exceeding \$250 per unit</b> )
71	7101; 7102; 7103; 7105 7106; 7107; 7108; 7109; 7110; 7111; 7113; 7114; 7115; 7116; 71042100; 71042900; 71049100; 71049900; 71181000; 711890; 71159000	N/A	Pearls, precious and semi-precious stones, articles of pearls  Jewellery, gold or silversmith articles ( <b>exceeding \$500 per unit</b> )  Coins and banknotes, not being legal tender  Cutlery of precious metal or plated or clad with precious metal ( <b>exceeding \$500 per unit</b> )
73	73041110; 73041990; 73042211; 73042391; 73042992; 73051100; 73051200;	73041110; 73041990; 73042211; 73042391; 73042412; 73042992; 73051100;	Line pipe of a kind used for oil or gas pipelines, seamless, of stainless steel  Line pipe of a kind used for oil or gas pipelines, seamless, of iron or steel, of an external diameter not exceeding 168.3 mm (excl. products of stainless steel or of cast iron)

	<p>73051900; 73052000; 73061113; 73061993; 73062114; 73062994</p>	<p>73051200; 73051900; 73052000; 73061113; 73061993; 73062114; 73062994; 73110025</p>	<p>Line pipe of a kind used for oil or gas pipelines, seamless, of iron or steel, of an external diameter exceeding 168.3 mm but not exceeding 406.4 mm (excl. products of stainless steel or of cast iron)</p> <p>Line pipe of a kind used for oil or gas pipelines, seamless, of iron or steel, of an external diameter exceeding 406.4 mm (excl. products of stainless steel or of cast iron)</p> <p>Drill pipe, seamless, of stainless steel, of a kind used in drilling for oil or gas</p> <p>Drill pipe, seamless, of a kind used in drilling for oil or gas, of iron or steel (excl. products of stainless steel or of cast iron)</p> <p>Casing and tubing, casing and tubing, seamless, of a kind used for drilling for oil or gas, of stainless steel (<b>for specified regions of Ukraine only</b>)</p> <p>Casing and tubing of a kind used for drilling for oil or gas, seamless, of iron or steel, of an external diameter not exceeding 168.3 mm (excl. products of cast iron)</p> <p>Casing and tubing of a kind used for drilling for oil or gas, seamless, of iron or steel, of an external diameter exceeding 168.3 mm, but not exceeding 406.4 mm (excl. products of cast iron)</p> <p>Casing and tubing of a kind used for drilling for oil or gas, seamless, of iron or steel, of an external diameter exceeding 406.4 mm (excl. products of cast iron)</p> <p>Line pipe of a kind used for oil or gas pipelines, having circular cross-sections and an external diameter of exceeding 406.4 mm, of iron or steel, longitudinally submerged arc welded</p> <p>Line pipe of a kind used for oil or gas pipelines, having circular cross-sections and an external diameter of exceeding 406.4 mm, of iron or steel, longitudinally arc welded (excl. products longitudinally submerged arc welded)</p> <p>Line pipe of a kind used for oil or gas pipelines, having circular cross-sections and an external diameter of exceeding 406.4 mm, of flat-rolled products of iron or steel (excl. products longitudinally arc welded)</p> <p>Casing of a kind used in drilling for oil or gas, having circular cross-sections and an external diameter of exceeding 406.4 mm, of flat-rolled products of iron or steel</p> <p>Line pipe of a kind used for oil or gas pipelines, welded, of flat-rolled products of stainless steel, of an external diameter of not exceeding 406.4 mm</p> <p>Line pipe of a kind used for oil or gas pipelines, welded, of flat-rolled products of iron or steel, of an external diameter of not exceeding 406.4 mm (excl. products of stainless steel or of cast iron)</p>
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82	<p>8207; 82071300; 82071900</p> <p>82151000; 82152000; 82159100; 82159900</p>	<p>8207; 82071300; 82071900</p>	<p>Interchangeable tools for hand tools, whether or not power-operated, or for machine-tools (for example, for pressing, stamping, punching, tapping, threading, drilling, boring, broaching, milling, turning or screw driving), including dies for drawing or extruding metal, and rock drilling or earth boring tools</p> <p>Rock-drilling or earth-boring tools, interchangeable, with working parts of sintered metal carbides or cermets</p> <p>Rock-drilling or earth-boring tools, interchangeable, with working parts of diamond or agglomerated diamond</p> <p>Cutlery of precious metal or plated or clad with precious metal <b>(exceeding \$500 per unit) (for Russia only)</b></p>
84	<p>Entire chapter (including 84713011; 84135001; 84136001; 84138200; 84139200; 84304900; 84313911; 84314300; 84314950)</p>	<p>Entire chapter (including 84713011; 84135001; 84136001; 84138200; 84139200; 84304900; 84313911; 84314300; 84314950)</p>	<p>Nuclear reactors, boilers, machinery and mechanical appliances; parts thereof</p> <p>Reciprocating positive displacement pumps for liquids, power-driven (excl. fuel, lubricating or cooling medium pumps for internal combustion piston engine and concrete pumps)</p> <p>Rotary positive displacement pumps for liquids, power-driven (excl. fuel, lubricating or cooling medium pumps for internal combustion piston engine)</p> <p>Liquid elevators (excl. pumps)</p> <p>Parts of liquid elevators, not elsewhere specified</p> <p>Boring or sinking machinery for boring earth or extracting minerals or ores, not self-propelled and not hydraulic (excl. tunnelling machinery and hand-operated tools) or parts of this machinery not elsewhere specified</p> <p>Parts of lifting, handling, loading or unloading machinery not elsewhere specified</p> <p>Parts of machinery of the following not elsewhere specified:</p> <ul style="list-style-type: none"> <li>• ships' derricks; cranes, including cable cranes; mobile lifting frames, straddle carriers and works trucks fitted with a crane</li> <li>• self-propelled bulldozers, angledozers, graders, levelers, scrapers, mechanical shovels,</li> </ul>



			<p>excavators, shovel loaders, tamping machines and road rollers; and</p> <ul style="list-style-type: none"> <li>Moving, grading, levelling, scraping, excavating, tamping, compacting, extracting or boring machinery, for earth, minerals or ores, pile-drivers and pile-extractors, snowploughs and snowblowers</li> </ul> <p>Personal consumer electronics (<b>exceeding \$500 per unit</b>)</p>
85	Entire chapter (including 85171300; 8524; 85287205)	Entire chapter	<p>Electrical machinery and equipment and related parts; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles</p> <p>Personal consumer electronics (<b>exceeding \$500 per unit</b>)</p>
86	8603	N/A	<p>Luxury vehicles for the transport of persons on earth, air or sea, as well as their accessories (<b>exceeding \$70,000 per unit</b>)</p>
87	8702; 8703; 871610; 87164000; 87168000; 8711; 871200; 8708; 8714; 871690; 87052010; 87052020	87052010; 87052020	<p>Luxury vehicles for the transport of persons on earth, air or sea, as well as their accessories (<b>exceeding \$70,000 per unit</b>) (<b>for Russia only</b>)</p> <p>Motorcycles, mopeds and bicycles, and parts and accessories thereof, and parts and accessories of luxury vehicles (see above) (<b>exceeding \$7,500 per unit</b>) (<b>for Russia only</b>)</p> <p>Mobile drilling derricks</p>
88	880100; 8802; 8806; 8807	8806; 8807	<p>Luxury vehicles for the transport of persons on earth, air or sea, as well as their accessories (<b>exceeding \$70,000 per unit</b>)</p> <p>Unmanned aircraft</p> <p>Parts of luxury vehicles or unmanned aircraft</p>
89	8903; 89052000(a); 89059000(a)	89052000(a); 89059000(a)	<p>Luxury vehicles for the transport of persons on earth, air or sea, as well as their accessories (<b>exceeding \$70,000 per unit</b>) (<b>for Russia only</b>)</p> <p>Floating or submersible drilling or production platforms</p> <p>Sea-going light vessels, fire-floats, floating cranes and other vessels, the navigability of which is subsidiary to their main function (excl. dredgers, floating or submersible drilling or production platforms; fishing vessels and warships)</p>
90	900490; 90200000	N/A	<p>Articles and equipment for skiing, golf and water sports (<b>exceeding \$500 per unit</b>)</p>
91	9101; 9102; 9103; 9104; 9105; 9108; 9109; 9110; 9111; 9112; 9113; 9114	N/A	<p>Clocks and watches and their parts (<b>exceeding \$500 per unit</b>)</p>
92	9201; 9202; 9205; 92060001; 9207	N/A	<p>Musical instruments (<b>exceeding \$2000 per unit</b>)</p>

93	93070000	N/A	Cutlery of precious metal or plated or clad with precious metal ( <b>exceeding \$500 per unit</b> )
95	950611; 950612; 95061900; 95062100; 95062900; 950631; 95063200; 95063950; 9507; 950420; 950430; 95044000; 95045000; 95049090	N/A	Articles and equipment for skiing, golf and water sports ( <b>exceeding \$500 per unit</b> )  Articles and equipment for billiard, automatic bowling, casino games and games operated by coins or banknotes, video game consoles and machines ( <b>exceeding \$500 per unit</b> )
96	96083000	N/A	Fountain pens, stylograph pens and other pens ( <b>exceeding \$200 per unit</b> )
97	Entire chapter	N/A	Works of art, collectors' pieces and antiques