When exporting dual-use items, EU businesses must comply with Regulation (EU) 2021/821 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items¹ (dual-use regulation). In addition, EU businesses must also comply with Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine² when exporting goods and services to Russia subject to restrictions.

As of 23 June 2022, the Commission notes that Annex VII of Regulation (EU) 833/2014 does not cover centrifugal pumps for liquids included in the Harmonised System (HS) code 8413.70. The Annex II of Regulation (EU) 833/2014 covers certain liquid pumps, but only under the HS codes 8413.50 and 8413.60. As regards electronic motors, however, it would depend on the type of electric motor as some electric motors are listed under Annex XXIII. Finally, as regards compliance with the dual-use regulation, if the pump is a self-standing watering system the exporter would have to ensure that the item to be exported is not listed as a dual-use item and take the necessary steps if it appears to be the case.

The Commission is regularly updating Frequently Asked Questions to support EU businesses in the implementation of restrictive measures against Russia³. The Commission is working extensively with national competent authorities of Member States to ensure a coordinated and harmonised implementation of export restrictions throughout the EU. In addition, the Commission is interacting extensively with partner countries to ensure convergence of the export restrictive measures adopted against Russia (Annex VIII of Regulation (EU) 833/2014).

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² OJ L 229, 31.7.2014.