

RIPE NCC Quarterly Sanctions Transparency Report (Q2 2023)

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Introduction

This quarterly report provides data on how RIPE NCC members, End Users and legacy resource holders are affected by sanctions, while respecting their confidentiality and privacy.

As an organisation based in the Netherlands, the RIPE NCC must comply with EU sanctions. If we believe that a member or other resource holder is subject to EU sanctions that are applicable to our services, we freeze the registration (not the use) of their resources in the RIPE Database. This means that sanctioned entities cannot acquire further resources or transfer existing ones. However, we do not deregister their resources or terminate their Standard Service Agreement (SSA) if they are RIPE NCC members.

Sanctions Data

The tables below show any changes since the previous quarter, as well as the total number of resource holders and resources affected. This includes the date of action and what action was taken. The table also shows our relation to a sanctioned entity – whether they are a RIPE NCC member, End User or legacy resource holder. We also specify the country in which the resource holder is legally registered.

Summary of Changes

Since our last report, four Russian members, three Iranian members and one Russian sponsoring End User have been flagged as non-cooperative. If a member or End User does not cooperate with our checks, we treat them as though they are sanctioned. This is because we have no way to establish otherwise. We have decided to include these members and End Users in this report for transparency.

Changes Since Last Quarter

| Date | Action | Relation | Country | IPv4 | IPv6 | ASNs |
|-------------|---------------------------|----------|---------|-----------|------|------|
| 24-Jan-2023 | Marked as non-cooperative | Member | RU | 4,096 | /32 | 1 |
| 27-Jan-2023 | Marked as non-cooperative | End user | RU | 256 | 0 | 1 |
| 30-Jan-2023 | Marked as non-cooperative | Member | RU | 256 | 0 | 1 |
| 2-Feb-2023 | Marked as non-cooperative | Member | RU | 8,192 | /32 | 1 |
| 7-Feb-2023 | Marked as non-cooperative | Member | IR | 9,216 | 0 | 1 |
| 14-Feb-2023 | Marked as non-cooperative | Member | RU | 1,024 | /32 | 0 |
| 7-Mar-2023 | Marked as non-cooperative | Member | IR | 1,024 | /29 | 1 |
| 15-Mar-2023 | Marked as non-cooperative | Member | IR | 1,313,792 | /32 | 1 |

Status on 31 March 2023

| Date | Action | Relation | Country | IPv4 | IPv6 | ASNs |
|-------------|--------|----------|---------|---------|------|------|
| 1-Apr-2020 | Frozen | Member | IR | 17,408 | /32 | 1 |
| 1-Apr-2020 | Frozen | Member | SY | 230,400 | /29 | 1 |
| 20-Apr-2020 | Frozen | Member | RU | 7,552 | /32 | 6 |
| 20-Apr-2022 | Frozen | Member* | RU | 4,096 | /32 | 13 |
| 13-May-2022 | Frozen | End User | RU | 0 | 0 | 1 |
| 26-Jul-2022 | Frozen | Member | GE | 1,024 | /29 | 1 |
| 17-Oct-2022 | Frozen | Member | RU | 1,024 | /29 | 2 |
| 17-Oct-2022 | Frozen | Member | RU | 6,400 | /29 | 10 |
| 14-Nov-2022 | Frozen | End User | RU | 512 | 0 | 1 |

| | | | | | | |
|-------------|---------------------------|----------|----|-----------|---------------------|----|
| 13-Jan-2023 | Marked as non-cooperative | End User | RU | 0 | 0 | 2 |
| 16-Jan-2023 | Marked as non-cooperative | Member | IR | 1,024 | /29 | 1 |
| 24-Jan-2023 | Marked as non-cooperative | Member | RU | 4,096 | /32 | 1 |
| 27-Jan-2023 | Marked as non-cooperative | End user | RU | 256 | 0 | 1 |
| 30-Jan-2023 | Marked as non-cooperative | Member | RU | 256 | 0 | 1 |
| 2-Feb-2023 | Marked as non-cooperative | Member | RU | 8,192 | /32 | 1 |
| 7-Feb-2023 | Marked as non-cooperative | Member | IR | 9,216 | 0 | 1 |
| 14-Feb-2023 | Marked as non-cooperative | Member | RU | 1,024 | /32 | 0 |
| 7-Mar-2023 | Marked as non-cooperative | Member | IR | 1,024 | /29 | 1 |
| 15-Mar-2023 | Marked as non-cooperative | Member | IR | 1,313,792 | /32 | 1 |
| Total | | | | 1,607,296 | 7 x /32, 6 x /29 | 46 |

* Member also holds Internet resources as an End User

Blocked Requests

The following requests were not processed by the RIPE NCC, either because of sanctions applicable to the End User, or due to the inability to complete investigations owing to uncooperative behaviour.

Blocked Requests

| Date | Request | Reason block | Country |
|-------------|--------------------------------|---|---------|
| 17-Oct-2022 | AS Number request | The RIPE NCC confirmed that sanctions apply to the new End User. | RU |
| 13-Jan-2023 | Membership application request | The RIPE NCC was unable to confirm the applicability of sanctions due to non-cooperation. | RU |
| 27-Jan-2023 | AS Number request | The RIPE NCC was unable to confirm the applicability of sanctions due to non-cooperation of the End User. | RU |

Cases Under Investigation

Alongside the number of resource holders confirmed to be subject to EU sanctions that are applicable to our services, there is a much larger number of potential matches under investigation. These statistics show the wider impact that sanctions are having on the Internet as well as the work needed to contact potential matches and request supporting documentation.

Most of these cases turn out to be false positives. However, because there is no grace period allowed for sanctions compliance, potential matches must be treated as though they are sanctioned until our staff can confirm otherwise. This means that we will not process any requests for new resources or to transfer existing ones until a potential sanctions case has been cleared.

Since early 2021, updates to the EU sanctions list have resulted in a total of 1,046 potential cases requiring investigation. Of these 1,046 alerts, 361 were in response to Russia's war on Ukraine (115 Members / 246 End Users).

Cases Under Investigation: Status of Cases

| Date | Total alerts for investigation | Not yet started | Under investigation | Confirmed FP or not applicable | Confirmed and applicable |
|-------------|--------------------------------|-----------------|---------------------|--------------------------------|--------------------------|
| 20-Apr-2022 | 766 | 362 | 173 | 227 | 4 |
| 01-Jul-2022 | 843 | 309 | 207 | 323 | 4 |

| | | | | | |
|-------------|-------|-----|-----|-----|---|
| 17-Oct-2022 | 932 | 368 | 184 | 372 | 8 |
| 02-Jan-2023 | 988 | 384 | 172 | 423 | 9 |
| 31-Mar-2023 | 1,046 | 411 | 191 | 435 | 9 |

Cases Requiring Investigation: Type of Resource Holder

| Date | Member | End User | Inter-RIR transfer | Total |
|-------------|--------|----------|--------------------|-------|
| 20-Apr-2022 | 343 | 420 | 4 | 766 |
| 01-Jul-2022 | 375 | 464 | 4 | 843 |
| 17-Oct-2022 | 411 | 517 | 4 | 932 |
| 02-Jan-2023 | 443 | 540 | 5 | 988 |
| 31-Mar-2023 | 464 | 577 | 5 | 1,046 |

Note: we also check against the Office of Foreign Asset Control (OFAC) sanctions list, which is maintained by the United States Government. While we are under no obligation to comply with US sanctions, they are a factor for banking institutions in the Netherlands.