

## DEPARTMENT OF COMMERCE

## Foreign-Trade Zones Board

[B-57-2023]

**Foreign-Trade Zone (FTZ) 61, Notification of Proposed Production Activity; AIAC International Pharma, LLC; (Pharmaceutical Products); Arcibo, Puerto Rico**

AIAC International Pharma, LLC submitted a notification of proposed production activity to the FTZ Board (the Board) for its facility in Arcibo, Puerto Rico within Subzone 61D. The notification conforming to the requirements of the Board's regulations (15 CFR 400.22) was received on November 7, 2023.

Pursuant to 15 CFR 400.14(b), FTZ production activity would be limited to the specific foreign-status material(s)/ component(s) and specific finished product(s) described in the submitted notification (summarized below) and subsequently authorized by the Board. The benefits that may stem from conducting production activity under FTZ procedures are explained in the background section of the Board's website—accessible via [www.trade.gov/ftz](http://www.trade.gov/ftz). The proposed finished product(s) and material(s)/component(s) would be added to the production authority that the Board previously approved for the operation, as reflected on the Board's website.

The proposed finished product is Janumet® XR tablets (sitagliptin and metformin hydrochloride extended release) (duty-free).

The proposed foreign-status material/ component is metformin hydrochloride active pharmaceutical ingredient (duty-free).

Public comment is invited from interested parties. Submissions shall be addressed to the Board's Executive Secretary and sent to: [ftz@trade.gov](mailto:ftz@trade.gov). The closing period for their receipt is December 26, 2023.

A copy of the notification will be available for public inspection in the "Online FTZ Information System" section of the Board's website.

For further information, contact Christopher Wedderburn at [Chris.Wedderburn@trade.gov](mailto:Chris.Wedderburn@trade.gov).

Dated: November 7, 2023.

**Elizabeth Whiteman,**  
Executive Secretary.

[FR Doc. 2023-24995 Filed 11-13-23; 8:45 am]

BILLING CODE 3510-DS-P

## DEPARTMENT OF COMMERCE

## Foreign-Trade Zones Board

[S-214-2023]

**Foreign-Trade Zone 26; Application for Subzone; Helena Industries, LLC; Cordele, Georgia**

An application has been submitted to the Foreign-Trade Zones (FTZ) Board by Georgina Foreign-Trade Zone, Inc., grantee of FTZ 26, requesting subzone status for the facilities of Helena Industries, LLC, located in Cordele, Georgia. The application was submitted pursuant to the provisions of the Foreign-Trade Zones Act, as amended (19 U.S.C. 81a-81u), and the regulations of the FTZ Board (15 CFR part 400). It was formally docketed on November 8, 2023.

The proposed subzone would consist of the following sites: *Site 1* (33 acres) 434 Fenn Road, Cordele, Georgia; and, *Site 2* (9.2 acres) 1198 Highway 280, Cordele, Georgia. A notification of proposed production activity has been submitted and is being processed under 15 CFR 400.37 (Doc. B-54-2023). The proposed subzone would be subject to the existing activation limit of FTZ 26.

In accordance with the FTZ Board's regulations, Christopher Kemp of the FTZ Staff is designated examiner to review the application and make recommendations to the Executive Secretary.

Public comment is invited from interested parties. Submissions shall be addressed to the FTZ Board's Executive Secretary and sent to: [ftz@trade.gov](mailto:ftz@trade.gov). The closing period for their receipt is December 26, 2023. Rebuttal comments in response to material submitted during the foregoing period may be submitted during the subsequent 15-day period to January 8, 2024.

A copy of the application will be available for public inspection in the "Online FTZ Information Section" section of the FTZ Board's website, which is accessible via [www.trade.gov/ftz](http://www.trade.gov/ftz).

For further information, contact Christopher Kemp at [Christopher.Kemp@trade.gov](mailto:Christopher.Kemp@trade.gov).

Dated: November 8, 2023.

**Elizabeth Whiteman,**  
Executive Secretary.

[FR Doc. 2023-25050 Filed 11-13-23; 8:45 am]

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## DEPARTMENT OF COMMERCE

## Bureau of Industry and Security

**Rossiya Airlines, Pilotov St 18-4, St. Petersburg, Russia, 196210; Order Renewing Temporary Denial of Export Privileges**

Pursuant to section 766.24 of the Export Administration Regulations, 15 CFR parts 730-774 ("EAR" or "the Regulations"),<sup>1</sup> I hereby grant the request of the Office of Export Enforcement ("OEE") to renew the temporary denial order ("TDO") issued in this matter on May 12, 2023. I find that renewal of this order is necessary in the public interest to prevent an imminent violation of the Regulations and that renewal for an extended period is appropriate because Rossiya Airlines ("Rossiya") has engaged in a pattern of repeated, ongoing and/or continuous apparent violations of the EAR.

**I. Procedural History**

On May 20, 2022, I signed an order denying Rossiya's export privileges for a period of 180 days on the ground that issuance of the order was necessary in the public interest to prevent an imminent violation of the Regulations. The order was issued *ex parte* pursuant to Section 766.24(a) of the Regulations and was effective upon issuance.<sup>2</sup> The TDO was subsequently renewed on November 15, 2022<sup>3</sup> and again on May 12, 2023,<sup>4</sup> in accordance with section 766.24(d) of the Regulations.<sup>5</sup>

<sup>1</sup> On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. 4801-4852 ("ECRA"). While section 1766 of ECRA repeals the provisions of the Export Administration Act, 50 U.S.C. app. 2401 *et seq.* ("EAA"), (except for three sections which are inapplicable here), section 1768 of ECRA provides, in pertinent part, that all orders, rules, regulations, and other forms of administrative action that were made or issued under the EAA, including as continued in effect pursuant to the International Emergency Economic Powers Act, 50 U.S.C. 1701 *et seq.* ("IEEPA"), and were in effect as of ECRA's date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA. Moreover, section 1761(a)(5) of ECRA authorizes the issuance of temporary denial orders. 50 U.S.C. 4820(a)(5).

<sup>2</sup> The TDO was published in the **Federal Register** on May 25, 2022 (87 FR 31856).

<sup>3</sup> The November 15, 2022 renewal order was published in the **Federal Register** on November 21, 2022 (87 FR 70780).

<sup>4</sup> The May 12, 2023 renewal order was published in the **Federal Register** on May 17, 2023 (88 FR 31483).

<sup>5</sup> At the time of the renewal, section 766.24(d) provided that BIS may seek renewal of a temporary denial order for additional 180-day renewal periods, if it believes that renewal is necessary in

On October 18, 2023, BIS, through OEE, submitted a written request for a third renewal of the TDO. The written request was made more than 20 days before the TDO's scheduled expiration and, given the temporary suspension of international mail service to Russia, OEE has attempted to serve a copy of the renewal request on Rossiya in accordance with sections 766.5 and 766.24(d) of the Regulations. No opposition to the renewal of the TDO has been received.

## II. Renewal of the TDO

### A. Legal Standard

Pursuant to section 766.24, BIS may issue an order temporarily denying a respondent's export privileges upon a showing that the order is necessary in the public interest to prevent an "imminent violation" of the Regulations, or any order, license or authorization issued thereunder. 15 CFR 766.24(b)(1) and 766.24(d). "A violation may be 'imminent' either in time or degree of likelihood." 15 CFR 766.24(b)(3). BIS may show "either that a violation is about to occur, or that the general circumstances of the matter under investigation or case under criminal or administrative charges demonstrate a likelihood of future violations." *Id.* As to the likelihood of future violations, BIS may show that the violation under investigation or charge "is significant, deliberate, covert and/or likely to occur again, rather than technical or negligent[.]" *Id.* A "lack of information establishing the precise time a violation may occur does not preclude a finding that a violation is imminent, so long as there is sufficient reason to believe the likelihood of a violation." *Id.*

If BIS believes that renewal of a denial order is necessary in the public interest to prevent an imminent violation, it may file a written request for renewal, with any modifications if appropriate. 15 CFR 766.24(d)(1). The written request, which must be filed no later than 20 days prior to the TDO's expiration, should set forth the basis for BIS's belief that renewal is necessary, including any additional or changed circumstances. *Id.* "In cases demonstrating a pattern of repeated, ongoing and/or continuous apparent violations, BIS may request the renewal of a temporary denial order for an additional period not exceeding one year." <sup>6</sup> *Id.*

the public interest to prevent an imminent violation.

<sup>6</sup> 88 FR 59791 (Aug. 30, 2023).

### B. The TDO and BIS's Request for Renewal

The U.S. Commerce Department, through BIS, responded to the Russian Federation's ("Russia's") further invasion of Ukraine by implementing a sweeping series of stringent export controls that severely restrict Russia's access to technologies and other items that it needs to sustain its aggressive military capabilities. These controls primarily target Russia's defense, aerospace, and maritime sectors and are intended to cut off Russia's access to vital technological inputs, atrophy key sectors of its industrial base, and undercut Russia's strategic ambitions to exert influence on the world stage. Effective February 24, 2022, BIS imposed expansive controls on aviation-related (e.g., Commerce Control List Categories 7 and 9) items to Russia, including a license requirement for the export, reexport or transfer (in-country) to Russia of any aircraft or aircraft parts specified in Export Control Classification Number ("ECCN") 9A991 (section 746.8(a)(1) of the EAR).<sup>7</sup> BIS will review any export or reexport license applications for such items under a policy of denial. *See* section 746.8(b). Effective March 2, 2022, BIS excluded any aircraft registered in, owned, or controlled by, or under charter or lease by Russia or a national of Russia from being eligible for license exception Aircraft, Vessels, and Spacecraft ("AVS") (section 740.15 of the EAR).<sup>8</sup> Accordingly, any U.S.-origin aircraft or foreign aircraft that includes more than 25% controlled U.S.-origin content, and that is registered in, owned, or controlled by, or under charter or lease by Russia or a national of Russia, is subject to a license requirement before it can travel to Russia.

OEE's request for renewal for a period of one year is based upon the facts underlying the issuance of the initial TDO, the renewal orders subsequently issued in this matter, and evidence that continues to develop during this investigation. These facts and evidence demonstrate that Rossiya has continued, and continues, to act in blatant disregard for U.S. export controls and the terms of previously issued TDOs. Specifically, the initial TDO, issued on

<sup>7</sup> 87 FR 12226 (Mar. 3, 2022). Additionally, BIS published a final rule effective April 8, 2022, which imposed licensing requirements on items controlled on the Commerce Control List ("CCL") under Categories 0–2 that are destined for Russia or Belarus. Accordingly, now all CCL items require export, reexport, and transfer (in-country) licenses if destined for or within Russia or Belarus. 87 FR 22130 (Apr. 14, 2022).

<sup>8</sup> 87 FR 13048 (Mar. 8, 2022).

May 20, 2022, was based on evidence that Rossiya engaged in conduct prohibited by the Regulations by operating multiple aircraft subject to the EAR and classified under ECCN 9A991.b on flights into Russia after March 2, 2022, from destinations including, but not limited to, Hurghada, Egypt; Sharm el-Sheikh, Egypt; Dubai, United Arab Emirates; and Sharjah, United Arab Emirates, without the required BIS authorization.<sup>9</sup> Further evidence submitted by BIS indicated that Rossiya also continued to operate aircraft subject to the EAR domestically on flights within Russia, potentially in violation of section 736.2(b)(10) of the Regulations.

As discussed in the prior renewal orders, BIS presented evidence indicating that, after the initial May 20, 2022 TDO issued, Rossiya continued to operate aircraft subject to the EAR and classified under ECCN 9A991.b on flights both into and within Russia, in violation of the Regulations and the TDO itself.<sup>10</sup> The November 15, 2022 order detailed flights into and out of Russia from/to Antalya and Istanbul, Turkey, as well as within Russia.<sup>11</sup> The May 12, 2023 renewal order documented a similar pattern of prohibited conduct.<sup>12</sup>

Since that time, Rossiya continued to engage in conduct prohibited by the TDO and Regulations. In its October 18, 2023, request for renewal of the TDO, BIS submitted evidence that Rossiya continues to operate aircraft subject to the EAR and classified under ECCN 9A991.b, both on flights into and within Russia, in violation of the May 12, 2023 renewal order and/or the Regulations. Specifically, BIS's evidence and related investigation demonstrates that Rossiya continued to operate aircraft subject to

<sup>9</sup> Publicly available flight tracking information shows that on March 8, 2022, serial number (SN) 27650 flew from Hurghada, Egypt to Moscow, Russia. On March 6, 2022, SN 41212 flew from Sharm el-Sheikh, Egypt to St. Petersburg, Russia and SN 44435 flew from Dubai, United Arab Emirates to St. Petersburg, Russia. In addition, on March 7, 2022, SN 41202 flew from Sharjah, United Arab Emirates to Moscow, Russia.

<sup>10</sup> Engaging in conduct prohibited by a denial order violates the Regulations. 15 CFR 764.2(a) and (k).

<sup>11</sup> Publicly available flight tracking information shows that SN 35278 flew from Antalya, Turkey to Moscow, Russia on November 12, 2022 and from Kaliningrad, Russia to Moscow, Russia on September 28, 2022. In addition, on SN 33622 flew from Istanbul, Turkey to St. Petersburg, Russia on November 2, 2022 and from Krasnoyarsk, Russia to Irkutsk, Russia on November 5, 2022.

<sup>12</sup> Publicly available flight tracking information shows that SN 34900 flew from Sharm el-Sheikh, Egypt to Moscow, Russia on March 20, 2023. Additionally, SN 34897 flew from Istanbul, Turkey to Moscow, Russia on March 16, 2023 and SN 28515 flew from Magadan, Russia to Anadyr, Russia on April 25, 2023.

the EAR, including, but not limited to, on flights into and out of Russia from/to Hurghada, Egypt, and Samarkand,

Uzbekistan, as well as domestically within Russia. Information about those

flights includes, but is not limited to, the following:

Tail No.	Serial No.	Aircraft type	Departure/arrival cities	Dates
RA-73188 .....	34900	737-8GJ	Bishkek, KG/Krasnoyarsk, RU .....	November 3, 2023.
RA-73188 .....	34900	737-8GJ	Hurghada, EG/Moscow, RU .....	September 27, 2023.
RA-73188 .....	34900	737-8GJ	Sharm el-Sheikh, EG/Moscow, RU .....	September 21, 2023.
RA-73192 .....	34897	737-8GJ	Hurghada, EG/Samara, RU .....	November 1-2, 2023.
RA-73192 .....	34897	737-8GJ	Hurghada, EG/Samara, RU .....	September 27, 2023.
RA-73192 .....	34897	737-8GJ	Hurghada, EG/Kazan, RU .....	September 25, 2023.
RA-73218 .....	35278	737-8Q8	Samarkand, UZ/St. Petersburg, RU .....	August 4, 2023.
RA-73218 .....	35278	737-8Q8	Tashkent, UZ/St. Petersburg, RU .....	July 31, 2023.
RA-73279 .....	28515	777-312	Anadyr, Ru/Moscow, RU .....	September 22, 2023.
RA-73279 .....	28515	777-312	Vladivostok, RU/Moscow, RU .....	August 29, 2023.
RA-73292 .....	28531	777-312	Moscow, RU/Magadan, RU .....	September 27, 2023.
RA-73292 .....	28531	777-312	Yuzhno-Sakhalinsk, RU/Moscow, RU .....	August 13, 2023.

### III. Findings

Under the applicable standard set forth in Section 766.24 of the Regulations and my review of the entire record, I find that the evidence presented by BIS demonstrates that Rossiya has acted in violation of the Regulations and the TDO; that such violations have been significant, deliberate and covert; and that given the foregoing and the nature of the matters under investigation, there is a likelihood of imminent violations. Moreover, I find that renewal for an extended period is appropriate because Rossiya has engaged in a pattern of repeated, ongoing and/or continuous apparent violations of the EAR. Therefore, renewal of the TDO for one year is necessary in the public interest to prevent imminent violation of the Regulations and to give notice to companies and individuals in the United States and abroad that they should avoid dealing with Rossiya, in connection with export and reexport transactions involving items subject to the Regulations and in connection with any other activity subject to the Regulations.

### IV. Order

*It is therefore ordered:*

*First*, Rossiya Airlines, Pilotov St 18-4, St. Petersburg, Russia, 196210, when acting for or on their behalf, any successors or assigns, agents, or employees may not, directly or indirectly, participate in any way in any transaction involving any commodity, software or technology (hereinafter collectively referred to as "item") exported or to be exported from the United States that is subject to the EAR, or in any other activity subject to the EAR including, but not limited to:

A. Applying for, obtaining, or using any license (except directly related to

safety of flight), license exception, or export control document;

B. Carrying on negotiations concerning, or ordering, buying, receiving, using, selling, delivering, storing, disposing of, forwarding, transporting, financing, or otherwise servicing in any way, any transaction involving any item exported or to be exported from the United States that is subject to the EAR except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations, or engaging in any other activity subject to the EAR except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations; or

C. Benefitting in any way from any transaction involving any item exported or to be exported from the United States that is subject to the EAR, or from any other activity subject to the EAR except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations.

Second, that no person may, directly or indirectly, do any of the following:

A. Export, reexport, or transfer (in-country) to or on behalf of Rossiya any item subject to the EAR except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations;

B. Take any action that facilitates the acquisition or attempted acquisition by Rossiya of the ownership, possession, or control of any item subject to the EAR that has been or will be exported from the United States, including financing or other support activities related to a transaction whereby Rossiya acquires or attempts to acquire such ownership, possession or control except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations;

C. Take any action to acquire from or to facilitate the acquisition or attempted acquisition from Rossiya of any item subject to the EAR that has been exported from the United States except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations;

D. Obtain from Rossiya in the United States any item subject to the EAR with knowledge or reason to know that the item will be, or is intended to be, exported from the United States except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations; or

E. Engage in any transaction to service any item subject to the EAR that has been or will be exported from the United States and which is owned, possessed or controlled by Rossiya, or service any item, of whatever origin, that is owned, possessed or controlled by Rossiya if such service involves the use of any item subject to the EAR that has been or will be exported from the United States except directly related to safety of flight and authorized by BIS pursuant to Section 764.3(a)(2) of the Regulations. For purposes of this paragraph, servicing means installation, maintenance, repair, modification, or testing.

*Third*, that, after notice and opportunity for comment as provided in section 766.23 of the EAR, any other person, firm, corporation, or business organization related to Rossiya by ownership, control, position of responsibility, affiliation, or other connection in the conduct of trade or business may also be made subject to the provisions of this Order.

In accordance with the provisions of sections 766.24(e) of the EAR, Rossiya may, at any time, appeal this Order by filing a full written statement in support of the appeal with the Office of the

Administrative Law Judge, U.S. Coast Guard ALJ Docketing Center, 40 South Gay Street, Baltimore, Maryland 21202–4022.

In accordance with the provisions of section 766.24(d) of the EAR, BIS may seek renewal of this Order by filing a written request not later than 20 days before the expiration date. A renewal request may be opposed by Rossiya as provided in section 766.24(d), by filing a written submission with the Assistant Secretary of Commerce for Export Enforcement, which must be received not later than seven days before the expiration date of the Order.

A copy of this Order shall be provided to Rossiya and shall be published in the **Federal Register**.

This Order is effective immediately and shall remain in effect for one year.

**Matthew S. Axelrod,**

*Assistant Secretary of Commerce for Export Enforcement.*

[FR Doc. 2023–25091 Filed 11–13–23; 8:45 am]

BILLING CODE 3510–DT–P

## DEPARTMENT OF COMMERCE

### Bureau of Industry and Security

**Nikolay Goltsev, a/k/a Nick Stevens, a/k/a Gio Ross, 107 Rue Caron, Ste-Anne-De-Bellevue, Quebec, Canada H9X4A1; Salimdzon Nasriddinov, 3734 Laurel Ave., Brooklyn, NY 11224; Kristina Puzyreva, 107 Rue Caron, Ste-Anne-De-Bellevue, Quebec, Canada H9X4A1; Vladimir Bochkarev, Privolnaya Street 75, Korp.1, Apt. 173, Moscow, Russia; Pavel Chernikov, Zoologicheskii Pereulok 9/11, Apt. 13, Moscow, Russia 123242; Yekaterina Vetoshkina, Ulitsa Privolnaya 75/1, Apt. 173, Moscow, Russia, 109431; Oleg Zenchenko, Vesenniya Street 16, Taytsy, Petersburg Region, Russia and Kupchinskaya Street 29/1, Apt. 363, St. Petersburg, Russia 192283; SH Brothers Group, Inc., 3734 Laurel Ave., Brooklyn, NY 11224; SN Electronics, Inc., 2650 AB Coney Island Ave., Brooklyn, NY 11223; Suntronic F.Z.E., Shiekh Khalifa Bin Zayed, St-Amberjem Tower E1/913, Ajman, United Arab Emirates; Order Temporarily Denying Export Privileges**

Pursuant to section 766.24 of the Export Administration Regulations (the “Regulations” or “EAR”),<sup>1</sup> the Bureau of

Industry and Security (“BIS”), U.S. Department of Commerce, through its Office of Export Enforcement (“OEE”), has requested the issuance of an Order temporarily denying, for a period of 180 days, the export privileges under the Regulations of: Nikolay Goltsev, Salimdzon Nasriddinov, Kristina Puzyreva, Vladimir Bochkarev, Pavel Chernikov, Yekaterina Vetoshkina, Oleg Zenchenko, SH Brothers Group, Inc. (“SH Brothers”), SN Electronics, Inc. (“SN Electronics”), and Suntronic FZE (“Suntronic”). OEE’s request and related information indicates that these parties are located in New York, the Russian Federation and the United Arab Emirates (“U.A.E.”), at the respective addresses listed on the caption page of this order and on page 16, *infra*.

### I. Legal Standard

Pursuant to section 766.24, BIS may issue an order temporarily denying a respondent’s export privileges upon a showing that the order is necessary in the public interest to prevent an “imminent violation” of the Regulations. 15 CFR 766.24(b)(1) and 766.24(d). “A violation may be ‘imminent’ either in time or degree of likelihood.” 15 CFR 766.24(b)(3). BIS may show “either that a violation is about to occur, or that the general circumstances of the matter under investigation or case under criminal or administrative charges demonstrate a likelihood of future violations.” *Id.* As to the likelihood of future violations, BIS may show that the violation under investigation or charge “is significant, deliberate, covert and/or likely to occur again, rather than technical or negligent[.]” *Id.* A “[l]ack of information establishing the precise time a violation may occur does not preclude a finding that a violation is imminent, so long as there is sufficient reason to believe the likelihood of a violation.” *Id.*

Presidential Notices, continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. 1701, *et seq.* (2012)) (“IEEPA”). On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. 4801–4852 (“ECRA”). While section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), section 1768 of ECRA provides, in pertinent part, that all orders, rules, regulations, and other forms of administrative action that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA. Moreover, section 1761(a)(5) of ECRA authorizes the issuance of temporary denial orders.

### II. OEE’S Request for a Temporary Denial Order

The U.S. Commerce Department, through BIS, responded to the Russian Federation’s (“Russia’s”) further invasion of Ukraine by implementing a sweeping series of stringent export controls that severely restrict Russia’s access to technologies and other items that it needs to sustain its aggressive military capabilities. These controls primarily target Russia’s defense, aerospace, and maritime sectors and are intended to cut off Russia’s access to vital technological inputs, atrophy key sectors of its industrial base, and undercut Russia’s strategic ambitions to exert influence on the world stage.

As of February 24, 2022, any item classified under any Export Classification Control Number (“ECCN”) in Categories 3 through 9 of the Commerce Control List (“CCL”) required a license to be exported or reexported to Russia. *See* 87 FR 12226 (Mar. 3, 2022). As of April 8, 2022, the license requirements for Russia were expanded to cover all items on the CCL. *See* 87 FR 22130 (Apr. 14, 2022). These rules were codified in 15 CFR 746.8, which state, “a license is required, excluding deemed exports and deemed reexports, to export, reexport, or transfer (in-country) to or within Russia or Belarus any item subject to the EAR and specified in any Export Control Classification Number (ECCN) on the CCL.”

BIS has imposed additional license requirements for exports, reexports and transfers to or within Russia of any items subject to the EAR that were identified under certain Schedule B or Harmonized Tariff Schedule 6 (“HTS”) numbers under Supplement No. 4 to Part 746—Russian and Belarusian Industry Sector Sanctions Pursuant to § 746.5(a)(1)(ii).<sup>2</sup> HTS codes take their first six digits from the corresponding Harmonized System (“HS”) code, a standardized numerical method of classifying traded products used by customs authorities around the world. On September 14, 2023, working in conjunction with the United Kingdom and European Union, BIS published a “Common High Priority Items List,” which identified items by their corresponding HTS codes listed in Supp. No. 4 to Part 746 that Russia sought to procure for its weapons programs.<sup>3</sup>

<sup>2</sup> *See, e.g.*, 87 FR 12856 (March 8, 2022).

<sup>3</sup> *See* <https://www.bis.doc.gov/index.php/all-articles/13-policyguidance/country-guidance/2172-russia-export-controls-list-of-common-high-priority-items>. Note that additional HTS codes were added

<sup>1</sup> The Regulations, currently codified at 15 CFR parts 730 through 774 (2023), originally issued pursuant to the Export Administration Act (50 U.S.C. 4601–4623 (Supp. III 2015) (“EAA”), which lapsed on August 21, 2001. The President, through Executive Order 13222 of August 17, 2001 (3 CFR, 2001 Comp. 783 (2002)), as extended by successive