

RIPE NCC Quarterly Sanctions Transparency Report

Author: RIPE NCC

Document ID: ripe-768

Date: 18 November 2021

Introduction

This quarterly report provides data on how RIPE NCC members, End Users and legacy resource holders are affected by sanctions, while respecting 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, we freeze their resources in the RIPE Database. This means that sanctioned entities cannot update their registration information and we do not make further resources available or process transfer requests on their behalf. 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 both resource holders and resources that are 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.

We also report on requests from sanctioned entities to receive services from us, such as requests to become a member or to receive an assignment of Provider Independent (PI) resources as an End User.

Summary of Changes

In April 2020, we announced that three RIPE NCC members were subject to EU sanctions and we had frozen their resources in the RIPE Database. Since then, the restrictions for one RIPE NCC member have been lifted following a re-assessment of the case.

Changes Since Last Quarter

Date	Action	Relation	Country	IPv4	IPv6	ASN
9-Nov-21	Restored	member	IR	1,024	0	1

Status on 20 October 2

Date	Action	Relation	Country	IPv4	IPv6	ASN
01-Apr-20	Frozen	Member	IR	17,408	/32	1
01-Apr-20	Frozen	Member	SY	230,400	/29	1
Totals				247,808	/29,/32	2

Blocked requests

Period	LIR Application	New End User	New Legacy Holder
Q2 2021	0	0	0
Q3 2021	0	0	0

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. A number of members from Iran (68) and Syria (7) have not yet received their 2021 invoice due to concerns on the part of our banks. Apart from making an internal note and notifying the member, no further action is taken if we find a match with the OFAC sanctions list.