



Certain Trade with Russia on Hold

Mar 28, 2014

Reading Time : **1 min**

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BIS has indicated that the hold policy applies to new license applications only; existing licenses remain valid and use of license exceptions is not impacted at this time. See more [here](#). DDTC has not yet publically confirmed whether the hold would apply to active licenses that it has already approved or whether it would prevent an exporter using exceptions or exclusions that may otherwise have applied to exports to Russia. However, we have learned through our sources that the DDTC hold policy would not impact existing licenses — to confirm, companies should contact the Office of Defense Trade Controls Licensing for confirmation. Moreover, we have been advised that DDTC and BIS will be issuing guidance in the coming days.

Together, DDTC and BIS have jurisdiction over items as seemingly basic as paraffin wax, on one end of the spectrum, and military helicopters and missiles at the other end. The hold policy implemented by BIS and DDTC could significantly impact companies with pending applications to export dual-use items, defense articles or defense services to Russia, as well as companies that may have made business decisions or entered into contracts based on an expectation of supply from the United States.

For the U.S. Department of Commerce BIS notice, please click [here](#). To see the U.S. Department of State DDTC notice, please click [here](#). For more information on the sanctions put in place in connection with the situation in Ukraine, see [here](#).

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