

RIPE NCC Quarterly Sanctions Transparency Report (Q4 2024)

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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.

If a member or End User does not cooperate with our checks, or if no documentation can be provided to conclude our investigation, 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; these cases are mentioned as 'on hold'. This replaces the 'non-cooperation' status used in previous reports, as this term does not cover situations where the member or End User is cooperative but unable to obtain the documentation requested.

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. This causes an impact for us on our ability to invoice members and receive payments from them.

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, one End User has been identified as subject to EU sanctions that are applicable to our services and therefore their resources were frozen according to our sanctions procedure. The freezing is not necessarily due to new EU sanctions or the addition of names to already existing EU sanction regulations. As can be seen in this and prior Sanctions Transparency Reports, there are still many sanction alerts from our Sanction Screening Tool that are awaiting a conclusion after investigation.

Note that we will not process any requests from an End User or member for new resources or transfer existing ones until a potential sanctions case has been cleared.

Changes Since Last Quarter

Date	Action	Relation	Country	IPv4	IPv6	ASNs
09/07/2024	Frozen	End User	RU	256	0	1

Status on 1 October 2024

Date	Action	Relation	Country	IPv4	IPv6	ASNs
01/04/2020	Frozen	Member	IR	17,408	/32	1
01/04/2020	Frozen	Member	SY	230,400	/29	1
16/01/2023	On hold	Member	IR	1,024	/29	1
07/02/2023	On hold	Member	IR	9,216	0	1
07/03/2023	On hold	Member	IR	1,024	/29	1

19/07/2023	On hold	Member	IR	8,192	/32	1
20/12/2023	On hold	Member	IR	58,368	/29	1
20/12/2023	On hold	End User	IR	0	0	1
15/05/2024	Frozen	Member	IR	2,048	0	1
15/05/2024	Frozen	Member	IR	33,792	/29	2
15/05/2024	Frozen	Member	IR	1,024	/29	1
15/05/2024	Frozen	Member	IR	1,024	0	1
15/05/2024	Frozen	End User	IR	0	0	1
15/05/2024	Frozen	End User	BY	0	0	1
15/05/2024	Frozen	End User	BY	512	0	1
15/05/2024	Frozen	End User	BY	0	0	1
01/07/2024	Frozen	Member	IR	99,328	/32, /29	3
09/07/2024	Frozen	End User	RU	256	0	1
Total				463,616	3x /32, 7x /29	21

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 transfer existing ones until a potential sanctions case has been cleared.

Important note:

As stated above, we also check against the Office of Foreign Asset Control (OFAC) sanctions list, as they are a factor for banking institutions in the Netherlands. In order to issue an invoice safely, we need to conduct an investigation for members with OFAC alerts received by our sanctions screening tool. As this is a big part of our sanctions screening work, we are now adding these numbers to the table below for transparency about our workload. Therefore, the numbers are higher than the last reports (with an additional 270 cases across all categories). Since early 2021 updates to the EU and OFAC sanctions list have resulted in a total of 1,608 cases requiring investigation.

Cases Under Investigation: Status of Cases

Date	Total alerts for EU and OFAC investigations	Not yet started	Under investigation	Confirmed false positive, EU sanctioned not applicable, exempted, or OFAC	On hold	Confirmed EU sanctioned and applicable to RIPE NCC services
20/04/2022 <i>OFAC investigations excluded</i>	766	362	173	227	0	4
01/07/2022 <i>OFAC investigations excluded</i>	843	309	207	323	0	4
17/10/2022 <i>OFAC investigations excluded</i>	932	368	184	372	0	8
02/01/2023 <i>OFAC investigations excluded</i>	988	384	170	423	2	9
31/03/2023 <i>OFAC investigations excluded</i>	1,046	411	181	435	10	9
10/07/2023 <i>OFAC investigations excluded</i>	1,205	456	145	596	6	2

11/10/2023 <i>OFAC investigations excluded</i>	1,218	410	118	682	6	2
05/01/2024 <i>OFAC investigations excluded</i>	1,266	385	61	811	7	2
15/05/2024 <i>OFAC investigations excluded</i>	1,324	414	17	877	6	10
01/07/2024 <i>OFAC investigations excluded</i>	1,338	316	33	972	6	11
01/10/2024 <i>OFAC investigations included</i>	1,608	228	29	1,333	6	12

Clarification of the statuses:

Not yet started: our sanctions screening alerted us to a possible EU and/or OFAC sanction match/update, and an investigation has been added to the backlog.

Under investigation: an EU and/or OFAC alert is being investigated.

On hold: a member or End User is not cooperating with our checks, or cannot obtain documentation to conclude our investigation for EU sanctions. Service restrictions are in place. The 'On hold' status replaces the 'Non-cooperation' status from previous reports. Numbers for this status used to be part of 'Under investigation', but now have a separate column for transparency.

Confirmed false positive: an EU sanctions screening alert was not related to the member or End User.

Not applicable: an EU sanctions alert is confirmed to be related to the member or End User, but is not applicable to the RIPE NCC, or else the member or End User have terminated their contractual relationship.

Exempt: an EU sanctions alert is relevant but the member or End User falls underneath EU sanctions exemptions as they relate to Internet resources.

OFAC: an OFAC sanctions alert is not related to our services, but investigations are necessary for billing purposes.

Cases Requiring Investigation: Type of Resource Holder

Date	Member	End User	Inter-RIR transfer	Total
20/04/2022	343	420	4	767
01/07/2022	375	464	4	843
17/10/2022	411	517	4	932
02/01/2023	443	540	5	988
31/03/2023	464	577	5	1,046
10/07/2023	519	681	5	1,205
11/10/2023	543	670	5	1,218
05/01/2024	568	693	5	1,266
15/05/2024	587	732	5	1,324
01/07/2024	595	738	5	1,338
01/10/2024 <i>OFAC investigations included</i>	818	785	5	1,608