

RIPE NCC Quarterly Sanctions Transparency Report (Q2 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, 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.

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Since our last report, one member had their non-cooperative status withdrawn.

Four members and four End Users have 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. These eight members and End Users were identified while prioritising certain cases.

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
15/04/2024	Non-cooperative status withdrawn	Member	IR	1,024	/29	1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

Status on 15 May 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	Marked as non-cooperative	Member	IR	1,024	/29	1
07/02/2023	Marked as non-cooperative	Member	IR	9,216	0	1

07/03/2023	Marked as non-cooperative	Member	IR	1,024	/29	1
19/07/2023	Marked as non-cooperative	Member	IR	8,192	/32	1
20/12/2023	Marked as non-cooperative	Member	IR	58,368	/29	1
20/12/2023	Marked as non-cooperative	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
Total				364,032	2x/32,6 x/29	17

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.

Since early 2021, updates to the EU sanctions list have resulted in a total of 1,324 potential cases requiring investigation.

Cases Under Investigation: Status of Cases

Date	Total alerts for investigation	Not yet started	Under investigation	Confirmed false positive, not applicable or exempt*	Confirmed sanctioned and applicable to RIPE NCC services
20/04/2022	766	362	173	227	4
01/07/2022	843	309	207	323	4
17/10/2022	932	368	184	372	8
02/01/2023	988	384	172	423	9
31/03/2023	1,046	411	191	435	9
10/07/2023	1,205	456	151	596	2

11/10/2023	1,218	410	124	682	2
05/01/2024	1,266	385	68	811	2
15/05/2024	1,324	414	23	877	10

* "Confirmed false positive" means that the EU sanction alert from the screening software was not related to the entity that is a member or End User. "Not applicable" are cases where the EU sanction alert is confirmed to be related to the member or End User, but the particular EU sanction regulation is not applicable to the RIPE NCC, or the case is not applicable anymore due to closure of the membership or End User relationship. "Exempt" is for cases where the EU sanction alert is confirmed to be related to the member or End User, but the EU sanction regulation has been exempted for Internet resources.

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

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.