

RIPE NCC Quarterly Sanctions Transparency Report (Q1 2025)

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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. The status of cases such as these is 'on hold'.

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 resource (one ASN) was frozen according to our sanctions procedure.

Changes Since Last Quarter

| Date | Action | Relation | Country | IPv4 | IPv6 | ASNs |
|------------|--------|----------|---------|------|------|------|
| 11/11/2024 | Frozen | End User | IR | 0 | 0 | 1 |

Status on 1 January 2025

| 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 |
| 11/11/2024 | Frozen | End User | IR | 0 | 0 | 1 |
| Total | - | - | - | 463,616 | 3x/32, 7x/29 | 22 |

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.

| 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 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 | 1,046 | 411 | 181 | 435 | 10 | 9 |
| OFAC investigations excluded | | | | | | |

| | | | | | | |
|------------------------------------|-------|-----|-----|-----|---|---|
| 10/07/2023 | 1,205 | 456 | 145 | 596 | 6 | 2 |
| OFAC investigations excluded | | | | | | |

| | | | | | | |
|------------------------------------|-------|-----|-----|-----|---|---|
| 11/10/2023 | 1,218 | 410 | 118 | 682 | 6 | 2 |
| OFAC investigations excluded | | | | | | |

| | | | | | | |
|------------------------------------|-------|-----|----|-----|---|---|
| 05/01/2024 | 1,266 | 385 | 61 | 811 | 7 | 2 |
| OFAC investigations excluded | | | | | | |

| | | | | | | |
|------------------------------------|-------|-----|----|-----|---|----|
| 15/05/2024 | 1,324 | 414 | 17 | 877 | 6 | 10 |
| OFAC investigations excluded | | | | | | |

| | | | | | | |
|------------------------------------|-------|-----|----|-----|---|----|
| 01/07/2024 | 1,338 | 316 | 33 | 972 | 6 | 11 |
| OFAC investigations excluded | | | | | | |

| | | | | | | |
|-----------------------|-------|-----|----|-------|---|----|
| 01/10/2024 | 1,608 | 228 | 29 | 1,333 | 6 | 12 |
| OFAC | | | | | | |
| <i>investigations</i> | | | | | | |
| <i>included</i> | | | | | | |

| | | | | | | |
|-----------------------|-------|-----|----|-------|---|----|
| 27/12/2024 | 1,660 | 128 | 26 | 1,487 | 6 | 13 |
| OFAC | | | | | | |
| <i>investigations</i> | | | | | | |
| <i>included</i> | | | | | | |

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.

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.

| 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 |
| 27/12/2024 <i>OFAC investigations included</i> | 851 | 803 | 6 | 1,660 |