

List of Common High Priority Items (*Version of February 2024*)

The EU and its international partners responded to Russia's war of aggression against Ukraine on 24 February 2022 with massive and comprehensive restrictive measures. The sectoral sanctions aim at curtailing Russia's ability to wage the war, depriving it of critical technologies and markets and significantly weakening its industrial base.

Regulation 833/2014 imposing sanctions against Russia has sharpened and includes prohibitions on the export, sale, transfer of dual-use goods and advanced technology items to target sensitive sectors in Russia's military industrial complex and to limit its access to crucial advanced technology.

The European Commission services, in coordination with the competent authorities in the US, the UK and Japan, have identified several prohibited dual-use goods and advanced technology items used in Russian military systems found on the battlefield in Ukraine or critical to the development, production or use of those Russian military systems. These items include electronic components such as integrated circuits and radio frequency transceiver modules, as well as items essential for the manufacturing and testing of the electronic components of the printed circuit boards, and manufacturing of high precision complex metal components retrieved from the battlefield.

These battlefield items have been grouped into a list of Common High Priority Items, which can be found in the Annex. The List may support due diligence and effective compliance by exporters and targeted anti-circumvention actions by customs and enforcement agencies of partner countries determined to prevent that their territories are being abused for circumvention of EU sanctions purposes.

The List of Common High Priority Items is divided into four Tiers containing a total of 50 (Harmonised System codes) dual-use and advanced technology items sanctioned under the Russia Sanctions Regulation and involved in Russian weapons system used against Ukraine, including e.g. the Kalibr cruise missile, the Kh-101 cruise missile, the Orlan-10 UAV and the Ka-52 "Alligator" helicopter.

The list is divided into four Tiers:

- **Tier 1** comprises four HS codes which describe integrated circuits (also referred to as microelectronics).
- **Tier 2** comprises five HS codes containing electronics items related to wireless communications, satellite-based radio-navigation and passive electronic components.
- **Tier 3** is itself divided in two sets:
 - Tier 3.A, which comprises 16 HS codes containing discrete electronic components, electrical plugs and connectors, navigation equipment and digital cameras.
 - Tier 3.B, which lists nine HS codes used to export mechanical and non-electronic components, such as bearings and optical components.
- **Tier 4** is also divided in two sets:
 - Tier 4.A, which includes 11 HS codes concerning manufacturing equipment for production and quality testing of electric components and circuits.
 - Tier 4.B, which lists 5 HS codes concerning Computer Numerical Control (CNC) machine tools for working metal, and related components.

The List is not static and will be periodically adjusted in the light of what is found in Russian military systems on the battlefield and Russia's use of sanctioned sensitive items. It replaces the previous September 2023 version.

TIER 1

| HS code (4) | Text |
|-------------|---|
| 8542.31 | Electronic integrated circuits: Processors and controllers, whether or not combined with memories, converters, logic circuits, amplifiers, clock and timing circuits, or other circuits |
| 8542.32 | Electronic integrated circuits: Memories |
| 8542.33 | Electronic integrated circuits: Amplifiers |
| 8542.39 | Electronic integrated circuits: Other |

TIER 2

| HS code (5) | Text |
|-------------|---|
| 8517.62 | Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus |
| 8526.91 | Radio navigational aid apparatus |
| 8532.21 | Other fixed capacitors: Tantalum capacitors |
| 8532.24 | Other fixed capacitors: Ceramic dielectric, multilayer |
| 8548.00 | Electrical parts of machinery or apparatus, not specified or included elsewhere in chapter 85 |

TIER 3.A

| HS code (16) | Text |
|--------------|---|
| 8471.50 | Processing units other than those of subheading 8471 41 or 8471 49, whether or not containing in the same housing one or two of the following types of unit: storage units, input units, output units |
| 8504.40 | Static converters |
| 8517.69 | Other apparatus for the transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless network |
| 8525.89 | Other television cameras, digital cameras and video camera recorders |
| 8529.10 | Aerials and aerial reflectors of all kinds; parts suitable for use therewith |
| 8529.90 | Other parts suitable for use solely or principally with the apparatus of headings 8524 to 8528 |
| 8536.69 | Plugs and sockets for a voltage not exceeding 1 000 V |
| 8536.90 | Electrical apparatus for switching electrical circuits, or for making connections to or in electrical circuits, for a voltage not exceeding 1000 V (excluding fuses, automatic circuit breakers and other apparatus for protecting electrical circuits, relays and other switches, lamp holders, plugs and sockets) |
| 8541.10 | Diodes, other than photosensitive or light-emitting diodes (LED) |
| 8541.21 | Transistors, other than photosensitive transistors with a dissipation rate of less than 1 W |
| 8541.29 | Other transistors, other than photosensitive transistors |
| 8541.30 | Thyristors, diacs and triacs (excl. photosensitive semiconductor devices) |
| 8541.49 | Photosensitive semiconductor devices (excl. Photovoltaic generators and cells) |
| 8541.51 | Other semiconductor devices: Semiconductor-based transducers |
| 8541.59 | Other semiconductor devices |
| 8541.60 | Mounted piezo-electric crystals |

TIER 3.B

| HS code (9) | Text |
|-------------|---|
| 8482.10 | Ball bearings |
| 8482.20 | Tapered roller bearings, including cone and tapered roller assemblies |
| 8482.30 | Spherical roller bearings |
| 8482.50 | Other cylindrical roller bearings, including cage and roller assemblies |
| 8807.30 | Other parts of aeroplanes, helicopters or unmanned aircraft |
| 9013.10 | Telescopic sights for fitting to arms; periscopes; telescopes designed to form parts of machines, appliances, instruments or apparatus of this chapter or Section XVI |
| 9013.80 | Other optical devices, appliances and instruments |
| 9014.20 | Instruments and appliances for aeronautical or space navigation (other than compasses) |
| 9014.80 | other navigational instruments and appliances |

TIER 4.A

| HS code (11) | Text |
|--------------|---|
| 8471.80 | Units for automatic data-processing machines (excl. processing units, input or output units and storage units) |
| 8486.10 | Machines and apparatus for the manufacture of boules or wafers |
| 8486.20 | Machines and apparatus for the manufacture of semiconductor devices or of electronic integrated circuits |
| 8486.40 | Machines and apparatus specified in note 11(C) to this chapter |
| 8534.00 | Printed circuits |
| 8543.20 | Signal generators |
| 9027.50 | Other instruments and apparatus using optical radiations (ultraviolet, visible, infrared) |
| 9030.20 | Oscilloscopes and oscillographs |
| 9030.32 | Multimeters with recording device |
| 9030.39 | Instruments and apparatus for measuring or checking voltage, current, resistance or electrical power, with recording device |
| 9030.82 | Instruments and apparatus for measuring or checking semiconductor wafers or devices |

TIER 4.B

| HS code (5) | Text |
|-------------|--|
| 8457.10 | Machining centres for working metal |
| 8458.11 | Horizontal lathes, including turning centres, for removing metal, numerically controlled |
| 8458.91 | Lathes (including turning centres) for removing metal, numerically controlled (excluding horizontal lathes) |
| 8459.61 | Milling machines for metals, numerically controlled (excluding lathes and turning centres of heading 8458, way-type unit head machines, drilling machines, boring-milling machines, boring machines, and knee-type milling machines) |
| 8466.93 | Parts and accessories suitable for use solely or principally with the machines of headings 8456 to 8461, n.e.s. |