EXPLANATORY MEMORANDUM TO

THE SANCTIONS (EU EXIT) (MISCELLANEOUS AMENDMENTS) REGULATIONS 2026

2026 No. 443

1. Introduction

1.1 This Explanatory Memorandum has been prepared by the Foreign, Commonwealth and Development Office (FCDO) and is laid before Parliament by Command of His Majesty.

1.2 This memorandum contains information for the Joint Committee on Statutory Instruments.

2. Declaration

2.1 Stephen Doughty MP, Minister of State at the Foreign, Commonwealth and Development Office, can confirm that this Explanatory Memorandum meets the required standard.

2.2 Abigail Culank, Deputy Director for Sanctions at the Foreign, Commonwealth and Development Office, can confirm that this Explanatory Memorandum meets the required standard.

3. Contact

3.1 The Sanctions Directorate at the Foreign, Commonwealth and Development Office, 0207 008 8553 or email: fcdo.correspondence@fcdo.gov.uk, can be contacted with any queries regarding the instrument.

Part One: Explanation, and context, of the Instrument

4. Overview of the Instrument

What does the legislation do?

4.1 The measures contained within the Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2026 (the "Regulations") will improve the clarity, consistency and strength of sanctions regulations made under section 1 of the Sanctions and Anti-Money Laundering Act 2018 ("the Sanctions Act"). The Regulations make a number of changes to 36 of the UKs sanctions regulations ("regimes").

4.2 These changes are as follows:

4.3 Impose end-user controls on exports where there is a risk of diversion to a sanctioned destination or persons. These apply across all regimes with trade sanctions. The Regulations introduce a prohibition of UK exports of UK sanctioned goods to a non-sanctioned third country where it has been determined there is a high risk that the goods will ultimately be diverted to a sanctioned jurisdiction. This will be subject to licencing provisions under the respective regime and enforced under the Customs and Excise Management Act 1979 ("CEMA").

4.4 Make a correction to the Zimbabwe sanctions regime where designation procedures incorrectly refer to the "Treasury" instead of the "Secretary of State". This correction will ensure consistency across all UK sanctions regulations where it references "the Secretary of State with the power to designate".

4.5 Make technical amendments to ship specification procedures under the Russia and DPRK sanctions regimes. It will clarify on the face of the Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) ("Russia") and the Democratic People's Republic of Korea (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/411) ("DPRK") ship specification procedures that were introduced by the Economic Crime (Transparency and Enforcement) Act 2022 ("ECA").The ECA streamlined ship specification procedures and provided that our sanctions regimes operate as if they contain, and had always contained, these amendments. Therefore, these amendments simply improve legislative clarity, reducing the risk of misinterpretation, facilitating compliance and aiding enforcement.

4.6 Ensure legal clarity by removing outdated wording regarding maximum sentencing lengths from sanction regulations following the amendment of CEMA by the Finance Act 2024.

4.7 Align certain definitions used in reporting requirements with upcoming changes to the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (S.I. 2017/692) ("MLRs"). This will help to ensure consistency across the UK's financial crime framework by updating sanctions reporting thresholds for high value dealers and art market participants from euros to pounds sterling.

4.8 Clarify sanctions licensing processes for Office of Financial Sanctions Implementation ("OFSI") by confirming that notices may be issued electronically without the need to obtain consent to this approach, reflecting modern administrative practice.

4.9 Provide legal clarity by confirming that the Treasury debt exception made in the Sanctions (EU Exit) (Treasury Debt) Regulations 2025 (S.I. 2025/712) applies to all stages of a payment chain, ensuring the sanctions framework operates as intended under relevant UN obligations. The revised wording confirms that the exception applies to all persons transferring funds as part of the payment chain in respect of Treasury debt, in line with the original policy intent.

4.10 Improve the operability of the sanctions framework by broadening the prior obligations licensing ground so satisfaction of pre-designation obligations can be licensed more effectively. This will enable the mitigation of sanctions impact on a range of UK and other non-designated persons, while preserving OFSI's ability to scrutinise all applications to prevent circumvention. The Regulations also correct the Afghanistan regime by removing the prior obligations licensing ground in line with UN obligations.

4.11 The Regulations are made under the Sanctions and Anti-Money Laundering Act 2018 ("the Sanctions Act") to make amendments to:

a) the Venezuela (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/135);

b) the Democratic People's Republic of Korea (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/411);

c) the Democratic Republic of the Congo (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/433);

d) the South Sudan (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/438);

e) the Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019 (S.I. 2019/461);

f) the ISIL (Da'esh) and Al-Qaida (United Nations Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/466);

g) the Republic of Guinea-Bissau (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/554);

h) the Counter-Terrorism (International Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/573);

i) the Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/577);

j) the Republic of Belarus (Sanctions (EU Exit) Regulations 2019 (S.I. 2019/600);

k) the Zimbabwe (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/604);

l) the Chemical Weapons (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/618);

m) the Syria (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/792);

n) the Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855);

o) the Guinea (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/1145);

p) the Cyber (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/597);

q) the Bosnia and Herzegovina (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/608);

r) the Nicaragua (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/610);

s) the Lebanon (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/612)

t) the Central African Republic (Sanctions) (EU Exit) Regulations (S.I. 2020/616);

u) the Lebanon (Sanctions) (Assassination of Rafiq Hariri and others) (EU Exit) Regulations 2020 (S.I. 2020/617)

v) the Somalia (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/642);

w) the Global Human Rights Sanctions Regulations 2020 (S.I. 2020/680);

x) the Mali (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/705);

y) the Iraq (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/707);

z) the Sudan (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/753);

aa) Afghanistan (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/948);

bb) the Syria (United Nations Sanctions) (Cultural Property) (EU Exit) Regulations 2020 (S.I. 2020/1233);

cc) the Yemen (Sanctions) (EU Exit) (No. 2) Regulations 2020 (S.I. 2020/1278);

dd) the Unauthorised Drilling Activities in the Eastern Mediterranean (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/1474);

ee) the Libya (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/1665);

ff) the Global Anti-Corruption Sanctions Regulations 2021 (S.I. 2021/488);

gg) the Myanmar (Sanctions) Regulations 2021 (S.I. 2021/496);

hh) the Haiti (Sanctions) Regulations 2022 (S.I. 2022/1281);

ii) the Iran (Sanctions) Regulations 2023 (S.I. 2023/1314);

jj) the Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 (S.I. 2025/902),

(together "the Amended Regulations").

Where does the legislation extend to, and apply?

4.12 The extent of the Regulations is the whole of the United Kingdom ("UK").

4.13 Subject to paragraph 4.12, the territorial application of the Regulations is also the same as the territorial application of the Amended Regulations, that is, it applies to the whole of the UK.

4.14 The Regulations therefore also apply to conduct by UK persons where that conduct is wholly or partly outside the UK and also apply to conduct by any person in the territorial sea adjacent to the UK. "UK person" is defined in section 21(2) of SAMLA as a UK national or a body incorporated or consolidated under the law of any part of the UK.

5. Policy Context

What is being done and why?

5.1 The Government is committed to improving the legislative clarity and consistency of sanctions regulations, to reduce the risk of misinterpretation, facilitate compliance and aid enforcement. The Regulations make amendments to the Amended Regulations to this effect, ensuring that the Government commitment is maintained.

5.2 The Regulations introduce end-user controls to ensure that UK exports are not diverted to sanctioned destinations and sanctioned persons. These are introduced across regimes with trade sanctions. The diversion of exports to sanctioned destinations and persons undermines the effectiveness of the UK's sanctions regimes and reduces the impact felt by the sanctioned destination or sanctioned person.

5.3 The greatest risk of diversion is currently to Russia. Following Russia's invasion of Ukraine in February 2022, the UK, along with our allies, has imposed wide-ranging sanctions aimed at encouraging the Russian Government to cease its invasion of Ukraine. The UK's bilateral trade in goods with Russia is down by 97% compared with 2021.[1] The UK's Russia sanctions regime has developed into the UK's most comprehensive set of sanctions to date. Despite these efforts, Russia and other sanctioned destinations are still managing to obtain items indirectly from the UK and allied nations.

5.4 The end-user control measure introduces a prohibition on exports of sanctioned goods to a non-sanctioned destination once the exporter has been 'informed' by the Business and Trade Secretary of State, of the risk of a specific export or transfer of technology to a third country being diverted to a sanctioned destination or by a sanctioned person. It will ensure that the exporter further considers the end-use or end-user of their export and whether they wish to proceed with seeking authority via an export licence. HM Government will assess with respect to each application, on a case-by-case basis, whether a proposed export or transfer proposes a risk of diversion to a sanctioned

[1] Source: Analysis of Trade Data Monitor (TDM) data, comparing the most recent 12 months of data (January to December 2025) to 2021.

destination or sanctioned person. If it does, then the Business and Trade Secretary of State can refuse the licence. If it does not, then trade will be able to continue without further restriction.

5.5 This measure will further strengthen powers to control and, where relevant, prevent exports of items otherwise not subject to export controls (i.e. items which are not on the UK's strategic controls lists for military or dual-use items, and which are otherwise not subject to the UK's Weapons of Mass Destruction and Military End Use Controls) to third countries in cases where there is risk of diversion of an item subject to sanction, to use in a sanctioned destination or by a sanctioned person.

5.6 This new measure will be applied across all sanctions regimes that include export restrictions to disrupt circumvention and bring parity across regimes. It will strengthen HM Government's licensing and enforcement powers and allow further assessment of the exports at risk of diversion to sanctioned destinations and sanctioned persons. This also responds to the recommendation included in the "Cross-government review of sanctions implementation and enforcement"[2], published in May 2025, in which HM Government committed to consider the introduction of sanctions end-user controls for exports at high risk of diversion.

5.7 The Regulations make a correction to the Zimbabwe sanctions regime where designation procedures incorrectly refer to the "Treasury" instead of the "Secretary of State". The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2025 (S.I. 2025/394) that introduced this incorrect reference originally sought to make amendments to UK sanctions regulations to reflect a new urgent procedure when designating persons by name, as introduced by the Economic Crime (Transparency and Enforcement) Act 2022 ("the 2022 Act". This correction will ensure consistency across all UK sanctions regulations where the Secretary of state is referenced as having the power to make designations.

5.8 The Regulations make a technical amendment to the Russia and DPRK sanctions regimes, which contain ship specification powers. It will clarify on the face of the Russia and DPRK regulations, ship specification procedures that were introduced by the 2022 Act. The 2022 Act streamlined ship specification procedures and provided that the sanctions regulations operate as if they contain, and had always contained, these amendments. Therefore, these amendments in the Regulations simply improve legislative clarity, reducing the risk of misinterpretation, facilitating compliance and aiding enforcement.

5.9 The Regulations remove defunct wording regarding CEMA maximum sentencing lengths from the 24 sanction regimes in which it applies in order to avoid legal ambiguity. This follows amendment of maximum sentencing lengths under CEMA by the Finance Act 2024, meaning that the wording in these sanctions regimes is no longer required.

5.10 The Regulations update the definitions of "high value dealer" and "art market participant" within the "relevant firm" regulations of our UK sanctions regimes so that the monetary thresholds are expressed in pounds sterling. This change aligns the terminology with upcoming amendments to the MLRs, ensuring consistency across regimes. Aligning the currency in this way removes unnecessary complexity for firms that are subject to reporting requirements and supports clearer, more coherent regulatory expectations.

[2] Cross-government review of sanctions implementation and enforcement was published on gov.uk on 15 May 2025

5.11 The Regulations amend the "Notices" provisions in relation to licensing to confirm that a notice may be given to a person by electronic means without requiring prior consent. This amendment supports efficient communication and ensures the legislation aligns with contemporary administrative practice.

5.12 The Regulations clarify that the exception relating to Treasury debt applies to all transfers of funds made as part of the payment chain in respect of that debt. This is necessary to avoid any ambiguity because the previous drafting was unclear as to whether a payment made in respect of Treasury debt by a non-designated person to a designated person at the end of the payment chain was covered. This is because it refers to an obligation owed by HM Treasury to the designated person in respect of Treasury debt, as opposed to an obligation owed by any non-designated person.

5.13 The Regulations update the prior obligations licensing ground, which enables payments or transfers to satisfy obligations that arose before a person was designated under financial sanctions. The current wording is narrow, preventing the licensing of some legitimate pre-existing obligations and creating uncertainty for businesses and individuals. The amendment broadens the licensing ground for all UK autonomous regimes so that satisfaction of such obligations can be licensed in a broader range of scenarios, including by allowing the use of funds other than a designated person's frozen funds where appropriate. This ensures that the licensing ground operates effectively and proportionately, while maintaining safeguards against the circumvention of sanctions. More limited changes are being made to regulations implementing UN regimes, to ensure conformity with the relevant United Nations Security Council Resolutions ("UNSCRs"). The prior obligations ground is also being removed from the Afghanistan regime, in line with relevant UNSCRs.

What was the previous policy, how is this different?

5.14 The Regulations introduce end-user controls to ensure that UK exports are not diverted to sanctioned destinations and sanctioned persons. Previously, the export of sanctioned goods and technology that HM Government identified as being at risk of diversion to use in a sanctioned country or by a sanctioned person once exported did not require a licence – unless the items were already subject to export controls (i.e. they were on the UK's strategic export controls for military or dual-use goods, or were otherwise subject to the UK's WMD or Military End Use Controls). Upon identifying this risk, the previous policy was to engage relevant businesses and highlight risk of diversion. This policy did not sufficiently mitigate the risk of diversion as a significant proportion of exporters chose to continue with export, even when they were not able to provide evidence that the risks identified had been mitigated.

5.15 Existing sanctions regulations related to trade include a prohibition on a person supplying or delivering sanctioned goods, "directly or indirectly", to sanctioned countries via a third country. However, this did not allow HM Government to require a licence where there was reasonable risk of sanctions diversion. This means that the goods need to be exported and subsequently imported by a sanctioned destination or person before enforcement action can be taken. This does not sufficiently mitigate risk of UK exports reaching sanctioned destinations and enforcement of the current prohibitions can be challenging.

5.16 The new policy differs as UK businesses exporting sanctioned goods or technology to third countries will be required to obtain a licence where HM Government identifies risk of diversion and the businesses are subsequently informed by the Business and

Trade Secretary of State. This provides a more robust framework for averting the diversion of sanctioned goods and technology to sanctioned locations and persons.

5.17 The licensing requirement will ensure both the exporter and HM Government fully assess the risk associated with a specific export and allow HM Government to refuse the export where it is not satisfied that the risk of diversion to a sanctioned end-user or end-use is mitigated.

5.18 The Regulations make a correction to the Zimbabwe sanctions regime. Previously, the Secretary of State with the power to designate was referenced consistently across UK sanctions regulations. However, in March 2025, the Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2025 referred to "the Treasury" instead of "the Secretary of State". This correction reinstates the reference to "the Secretary of State". This therefore does not reflect a change in policy.

5.19 The Regulations make technical amendments to ship specification procedures under the Russia and DPRK sanctions regimes. The 2022 Act previously provided that these sanctions regulations operated as if they contained, and had always contained, these amendments. This therefore does not reflect a change in policy.

5.20 The Regulations remove defunct wording regarding CEMA maximum sentencing lengths. The Finance Act 2024 increased the maximum sentence under CEMA from 7 to 14 years for a number of offences, whilst the maximum provided under section 17 of SAMLA is 10 years. The wording in sanctions regulations under "Trade Offences in CEMA: modification of penalty" (for example regulation 86 of The Russia (Sanctions) (EU Exit) Regulations 2019) stated that 'the reference to 7 years [for various sanctions related offences in] CEMA is to be read as a reference to 10 years'. This therefore is a technical amendment to remove defunct wording and does not reflect a change in policy.

5.21 The Regulations update the definitions of "high value dealer" and "art market participant" within the "relevant firm" regulations of our UK sanctions regimes. Previously, high value dealers and art market participants were required to report under sanctions legislation using euro-denominated thresholds. With the MLRs moving to pound-denominated thresholds, the Regulations update the sanctions reporting thresholds to pounds sterling as well. Therefore, this is a technical amendment to align with other legislation and does not reflect a change in policy.

5.22 The Regulations amend the "Notices" provisions in relation to licensing. Previously, sanctions regulations stipulated that electronic notices relating to licences could only be issued with the recipient's prior consent. The Regulations modernise these provisions by confirming that licensing authorities may issue notices electronically without prior consent for this approach.

5.23 The Regulations clarify that the exception relating to Treasury debt applies to all transfers of funds made as part of the payment chain in respect of that debt. Previously the existing exception for payments relating to Treasury debt referred only to obligations owed "by the Treasury", which created uncertainty as to whether the exception applied to all parts of a payment chain as set out above at paragraph 5.12 above. The Regulations clarify that the exception covers the full chain of payments.

5.24 The Regulations update the prior obligations licensing ground. Previously the drafting required that obligations be satisfied using a designated person's frozen funds, and (in most cases) only where that designated person personally owed the obligation, which limited OFSI's ability to license legitimate pre-designation obligations and created operational and legal constraints. The instrument broadens the licensing ground so

that under UK autonomous regimes, prior obligations may be met using any funds and discharged by any person, including owned or controlled entities, enabling a wider range of legitimate prior obligations to be licensed while maintaining appropriate safeguards against sanctions circumvention. More limited changes are being made to non-autonomous regimes, to ensure conformity with the limits in the relevant UNSCRs.

6. Legislative and Legal Context

How has the law changed?

6.1 The Regulations apply to the Amended Regulations made under powers in the Sanctions Act. The Sanctions Act establishes a legal framework which enables HM Government to impose sanctions for a number of purposes, including that it is in the interests of international peace and security and that it furthers a foreign policy objective of the government of the UK.

6.2 The Regulations introduce a new offence to export a sanctioned good to a non-sanctioned destination without a licence, once that exporter has been informed by the Business and Trade Secretary of the risk of a specific export or transfer of technology to a third country being diverted to, or for use in, a sanctioned regime.

6.3 Under previous legislation, exports to third countries at risk of diversion (to a sanctioned destination) were able to lawfully progress despite being advised by HM Government that these exports were at risk of diversion.

6.4 The Regulations make a correction to regulation 5A (3) and (5) of the Zimbabwe (Sanctions) (EU Exit) Regulations 2019 by substituting "the Secretary of State" for "the Treasury". The error originates in regulation 11(3) of The Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2025 that referred to "the Treasury" instead of "the Secretary of State".

6.5 The Regulations make technical amendments to ship specification procedures under the Russia and DPRK sanctions regimes. It will clarify on the face of these regulations, ship specification procedures that were introduced by the 2022 Act. Section 60 of the 2022 Act amended section 14 of Sanctions Act to make new provision about the restrictions on the power of an appropriate Minister to specify a ship. Under section 14, as amended, such regulations will no longer need to provide that a Minister can specify a ship only where the Minister considers that such a specification is appropriate, having regards to the purpose of the relevant sanctions regulations and to the likely effects of the specification (the "appropriateness test"). Section 61 of the 2022 Act provides that pre-commencement sanctions regulations currently operate as if they contain, and have always contained, the changes made by the 2022 Act. Therefore, these amendments in the Regulations simply improve legislative clarity, reducing the risk of misinterpretation, facilitating compliance and aiding enforcement.

6.6 The Regulations remove defunct wording regarding CEMA maximum sentencing lengths. The Sanctions Act allows regulations to be made that modify maximum periods of imprisonment for CEMA offences, but the maximum period must not exceed 10 years. Relying on this provision, the wording in regulations under "Trade Offences in CEMA: modification of penalty" (for example regulation 86 of the Russia Regulations) stated that where a person was guilty of various CEMA offences relating to trade sanctions the reference in CEMA to a maximum period of imprisonment of 7 years was to be read as 10 years. However, the recent amendment to CEMA through

the Finance Act 2024, which was principally intended to increase the maximum terms of imprisonment for tax offences, increased the maximum period of imprisonment for relevant CEMA offences from 7 to 14 years. The Regulations will remove the defunct provisions. Sanctions offences of this nature will remain subject to a 10-year maximum imprisonment period.

6.7 The Regulations update the definitions of "high value dealer" and "art market participant" within the "relevant firm" regulations of our UK sanctions regimes. The law previously required "high value dealers" and "art market participants" to use euro-denominated thresholds when determining if they were in scope of reporting requirements under sanctions legislation. This instrument updates those thresholds to pounds sterling to maintain alignment with forthcoming amendments to the Money Laundering Regulations.

6.8 The Regulations amend the "Notices" provisions in relation to licensing. Sanctions regulations previously stated that electronic licence notices could only be issued with the recipient's pre-requisite consent. This instrument amends the legislation by removing the consent requirement for electronic means, indicating that notices may be issued electronically without explicitly requiring consent.

6.9 The Regulations clarify that the exception relating to Treasury debt payments applies to all transfers of funds made as part of the payment chain in respect of that debt. The existing exception for Treasury debt-related payments referred only to obligations owed "by the Treasury", creating ambiguity about whether it applied to all parts of the payment chain, in particular transfers of funds from a non-designated person in respect of Treasury debt to a designated person at the end of the payment chain. This instrument clarifies that the exception covers the full payment chain.

6.10 The Regulations update the prior obligations licensing ground. The prior obligations licensing ground previously required obligations to be satisfied using a designated person's frozen funds and (for the most part) only where the relevant designated person owed the obligation, limiting OFSI's ability to license legitimate pre-designation obligations. This instrument broadens the derogation for UK autonomous regimes, so that obligations may be satisfied using any funds and by any person, improving operability while maintaining sanctions safeguards. More limited changes are being made to non-autonomous regimes, to ensure conformity with the limits in the relevant UNSCRs. The prior obligations ground is being removed from the Afghanistan regulations in line with relevant UNSCRs.

Why was this approach taken to change the law?

6.11 The Regulations clarify and strengthen the sanctions legislative framework, reducing the risk of misinterpretation, facilitating compliance and aiding enforcement. Amending the Amended Regulations under the legal framework provided by the Sanctions Act is considered to be the most effective and appropriate way to change the law and is in line with the approach which has been taken for equivalent sanctions amendments.

7. Consultation

Summary of consultation outcome and methodology

7.1 No public consultation has been carried out on the Regulations. However, public consultation was carried out in relation to the Sanctions Act.

7.2 There is neither a requirement in the Sanctions Act for public consultation on Regulations made under the Sanctions Act, nor is there any other legal obligation to consult in respect of the Regulations. HM Government will continue engagement with stakeholders on the implementation of UK sanctions

8. Applicable Guidance

8.1 In accordance with section 55(3) of the Sanctions Act, guidance has been published in relation to the prohibitions and requirements imposed under sanctions regulations. This guidance will be updated to reflect the amendments to those regulations made by this instrument where necessary.

8.2 Certain amendments in the Regulations do not create any new prohibitions or requirements that require guidance. In these cases, there will be no external guidance produced.

8.3 OFSI will also ensure that any necessary updates will be made to the UK financial sanctions guidance pages to reflect changes in the amendments that affect OFSI.

Part Two: Impact and the Better Regulation Framework

9. Impact Assessment

9.1 A full Impact Assessment has not been prepared for these Regulations. The Foreign, Commonwealth & Development Office have undertaken an assessment to estimate costs to UK businesses resulting from this Amendment. It estimates the only the only monetisable impacts on UK businesses comes from the implementation of the End-User Controls measure as it would allow HMRC/Border Force to detain or return shipments until an export licence is obtained.

9.2 The estimated annual net cost to business is expected to be £0.1m. Only a small number of additional exports are expected to require licences. As such we do not expect the costs to exceed the De Minimis threshold of £10.0m per annum, so a full Regulatory Impact Assessment has not been conducted.

9.3 Any costs to business would be driven by wider administrative and familiarisation costs, not by a loss of trade.

Impact on businesses, charities and voluntary bodies

9.4 There is no, or no significant, impact on business, charities or voluntary bodies because these amendments either update, provide fixes or clarifications to existing legislation.

9.5 Small and micro-businesses will not be exempt from this regulation. Since small firms are impacted disproportionately by regulatory burdens, they will likely bear a greater relative familiarisation cost.

9.6 Hence, there will likely be some impact on small or micro businesses driven by the cost of familiarisation and aligning with new regulation. However, due to a very low estimated annual net cost to business of £0.1m, these costs to small businesses are expected to be negligible and have not been monetised.

9.7 Other costs include implementation costs and costs relating to compliance, changes to IT systems and administrative processes, legal advice and other professional services. These costs are expected to be minimal and have not been monetised.

9.8 The annual cost to the public sector is £1.4m throughout the 10-year appraisal period. These public sector costs arise from assessing additional licence applications and enforcing licences.

10. Monitoring and review

What is the approach to monitoring and reviewing this legislation?

10.1 If His Majesty's Government determines that it is no longer appropriate to maintain a sanctions regime or specific sanctions measures, that regime will be removed or amended accordingly. This would include the amendments made by the Regulations. As such, the Minister does not consider that a review clause in these Regulations is appropriate.

Part Three: Statements and Matters of Particular Interest to Parliament

11. Matters of special interest to Parliament

11.1 The Regulations, which are subject to the negative parliamentary procedure, are laid before Parliament on 22 April 2026 under section 55(6) of the Sanctions Act and come into force 21 days after laying.

***Matters of special interest to the Joint Committee on Statutory Instruments** (JCSI)*

11.2 The Regulations amend both mixed UK/UN sanctions regimes which are subject to the negative Parliamentary procedure (in accordance with section 55(6) of the Sanctions Act) and UK autonomous sanctions regimes which are subject to the made affirmative Parliamentary procedure (in accordance with section 55(3)).

11.3 The Regulations make some of the same changes across all the Amended Regulations and therefore are combined into one instrument which enhances accessibility. As the Regulations contain 'UN regulations' within the meaning of section 55(7) of the Sanctions Act, they attract the negative Parliamentary procedure as provided for in section 55(6).

11.4 The Regulations include a correction to the Zimbabwe (Sanctions) (EU Exit) Regulations 2019 as recommended by the JCSI in their Twenty-fourth Report of the Session of 2024-25 (published on 16 May 2025) concerning the Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2025.

12. European Convention on Human Rights

12.1 As the instrument is subject to the negative procedure and does not amend primary legislation, no statement is required.

13. The Relevant European Union Acts

13.1 The Regulations are not made under the European Union (Withdrawal) Act 2018, the European Union (Future Relationship) Act 2020 or the Retained EU Law (Revocation and Reform) Act 2023 ("relevant European Union Acts").