

(English version)

**Priority question for written answer P-004043/25
to the Commission
Anna Maria Cisint (PFE)
(15 October 2025)**

Subject: Lack of a DG FISMA response to economic operators, risking the collapse of a major intra-European industrial project

On 29 August 2025, the Italian trade association Assarmatori ⁽¹⁾ submitted a formal question to the Commission's contact point on the subject of sanctions against Russia ⁽²⁾.

An industrial project in the field of marine renewables ⁽³⁾ has ground to a halt owing to a doubt expressed by the national authorities, namely over whether FAQ G.3.6 dated 2 May 2022, published on the Commission's website and relating to the implementation of Article 3(e)(a) of Council Regulation (EU) No 833/2014, should still be deemed applicable ⁽⁴⁾.

The association submitted its question through the official channels, after having described the project, emphasising the importance of the clarification requested, and specifying that the lack of legal certainty over the FAQ was preventing the project from being implemented.

Despite enjoiners, higher-level institutional contacts and the sending of a new letter signed by all the economic operators involved — including an Italian company from Friuli — the Commission services only replied on 6 October, without providing any clarification as to whether FAQ G.3.6 remains valid. A further request was therefore submitted, but has received no reply to date.

The project is tied in with major industrial contracts, and is liable to be severely affected by these failings and the lack of an immediate response.

Can the Commission clarify whether the FAQ in question remains valid and applicable, so that the national authorities — within the framework of the requisite cooperation with the institutions — can take the necessary decisions?

Submitted: 15.10.2025

**Answer given by Ms Albuquerque on behalf of the European Commission
(18 November 2025)**

EU sanctions on Russia prohibit access to EU ports and locks for vessels flying the Russian flag, as well as those that have reflagged from Russia after 24 February 2022. A number of derogations are foreseen.

The responsibility for assessing whether a specific operation qualifies under one of the derogations lies with the competent national authorities who remain competent to interpret and apply a possibly relevant derogation. In this case, the Italian authorities are responsible for evaluating the logistics operation and determining the applicability of the relevant provisions. Moreover, it is important to clarify that the FAQ published by the Commission ⁽¹⁾, and referred to in the question, does not concern this specific case.

The Commission services remain available to support Member States in the implementation of the sanctions regime and to provide technical guidance where appropriate.

¹ Registered in the EU Transparency Register under No 223802233480-26.

² In August, economic operators with questions about a specific commercial transaction or, more generally, about the sanctions system, could contact the Commission directly on the DG FISMA website via the mailbox EC-RUSSIA-SANCTIONS@ec.europa.eu. The DG FISMA website no longer offers this service.

³ Part of a pan-European project dedicated to clean energy production.

⁴ https://finance.ec.europa.eu/document/download/66e8fd7d-8057-4b9b-96c2-5e54bf573cd1_en?filename=faqs-sanctions-russia-consolidated_en.pdf.

⁽¹⁾ https://finance.ec.europa.eu/document/download/66e8fd7d-8057-4b9b-96c2-5e54bf573cd1_en?filename=faqs-sanctions-russia-consolidated_en.pdf.