TurkStream pipeline project, or any
the Nord Stream 2 pipeline project, the
focuses on vessels engaged in pipe-
'the construction of such a project” in Section 7503(a)(1)(B) may
cover foreign firms or persons who
provide certain services or goods that
are necessary or essential to the
 provision or operation of a vessel
engaged in the process of pipe-laying for
such projects. Such activities subject to
sanctions pursuant to PEESA or other
authorities may include, but are not
limited to, providing services or
facilities for upgrades or installation of
equipment for those vessels, or funding
for upgrades or installation of
equipment for those vessels. The
Department of State and the Department
of the Treasury are prepared to use the
full range of sanctions authorities to halt
construction of these pipelines.

Pursuant to section 7503(e)(3) of
PEESA, sanctions will not apply to
persons providing provisions to a
relevant vessel if such provisions are
intended for the safety and care of the
crew aboard the vessel, the protection of
human life aboard the vessel, or the
maintenance of the vessel to avoid any
environmental or other significant
damage.

Pursuant to section 7503(e)(4) of
PEESA, sanctions will not apply to
persons engaging in activities necessary
for or related to the repair or
maintenance of, or environmental
remediation with respect to, Nord
Stream 2, TurkStream, or any project
that is a successor to either such project.

2. Will the United States impose
sanctions on persons engaged in certain
activities prior to the issuance of this
clarification of the term “provided”?

No, the United States will not impose
sanctions on persons that the Secretary
of State, in consultation with the
Secretary of the Treasury,
determines have knowingly sold, leased
or provided those vessels for the
construction of such a project; or
facilitated deceptive or structured
transactions to provide those vessels for
the construction of such a project.

Frequently Asked Questions

1. How does the State Department
interpret the term knowingly
“provide[d] those vessels for the
construction of such a project” in
PEESA Section 7503(a)(1)(B)?

For the purposes of PEESA, which
focuses on vessels engaged in pipe-
laying at depths of 100 feet or more
below sea level for the construction of
the Nord Stream 2 pipeline project, the
TurkStream pipeline project, or any
project that is a successor to either such
project (see Section 7503(a)(1)(A)), the
phrase knowingly “provide[d] those
vessels for the construction of such a
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