

## Davis Polk Client Memorandum: Second Round of Sanctions on the Russian Federation under Chemical and Biological Weapons Control and Warfare Elimination Act

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On August 3, 2019, the [U.S. Department of State](#) and the [Department of the Treasury](#) announced a second round of sanctions on the Russian Federation pursuant to the Chemical and Biological Weapons Control and Warfare Elimination Act of 1991 (**CBW Act**) in response to Russia's involvement in a chemical weapons attack in the United Kingdom in March 2018. The newly announced sanctions include:

- A prohibition on U.S. banks participating in the primary market for non-ruble denominated bonds issued by the Russian sovereign and lending non-ruble denominated funds to the Russian sovereign;
- Continuation of the United States' opposition to the extension of any loan or financial or technical assistance to Russia by international financial institutions, such as the World Bank or International Monetary Fund; and
- Imposition of further export restrictions, including a "presumption of denial" approach for items controlled for chemical and biological weapon proliferation reasons.

The sanctions take effect after August 26, 2019, following a required Congressional notification period.

Our [client memorandum](#) discusses the new sanctions in more detail.