



Foreign, Commonwealth  
& Development Office

**Lord Collins of Highbury**  
Parliamentary Under Secretary of State  
for Foreign, Commonwealth and  
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5 November 2024

Dear Lord Vaux,

Thank you for your contribution to the Statutory Instrument debate on The Russia (Sanctions) (EU Exit) (Amendments) (No.3) Regulations 2024. I would like to express my gratitude for your continued support, as we seek to use our sanctions capabilities to ensure Putin is held to account for Russia's illegal invasion. I am pleased to respond to the questions raised during the debates on the unintended consequences of oil circumvention, the 'Shadow Fleet' and the Government engagement with India.

### **Environmental impact of the 'Shadow Fleet'**

You asked about the unintended consequences of oil circumvention. As well as seeking to soften the blow of our sanctions, the shadow fleet poses risks to the environment too. The Government is taking meaningful steps to confront those risks. The Department for Transport is working alongside the Joint Maritime Security Centre (JMSC) and the Maritime and Coastguard Agency (MCA) to challenge shadow fleet vessels with suspected inadequate insurance to provide details of their insurance status as they pass through the English Channel. Any actor that facilitates and supports Russia's malign activities could be exposing themselves to sanctions action.

### **Oil circumvention and India**

You also asked about oil circumvention and the governments engagement with India. The action the UK and its partners have taken to limit Russian energy revenues is having a significant impact, with Russia forced to shoulder a 24% reduction in oil and gas revenues in 2023 compared to 2022.

Importers of oil and oil products into the UK, as well as those seeking to access UK services to facilitate above-cap oil trades, must provide proof that goods are not of Russian origin. The Government is committed to rigorously enforcing our sanctions and keeps all our sanctions under review.

The Government recognises India's long and historic relationship with Russia and regularly raises Russia's actions in Ukraine with India separately outside of the Free Trade Agreement negotiations. The Foreign Secretary did so most recently with both Prime Minister Modi and External Affairs Minister Jaishankar during his visit to India in July.

India is a key UK partner, and we are committed to working together across a range of issues, including our commitment to tackle all forms of sanctions circumvention. Russia is not a reliable energy partner and we continue to raise this with India, as well as the environmental safety and economic risks posed by the Russian shadow fleet's practices. All importers of oil and oil products into the UK, as well as those seeking to access UK services to facilitate above-cap oil trades, must provide proof that goods are not of Russian origin.

Finally, I would like to correct the record. During the debate I referenced a previous debate which I took part in, while in Opposition, as having taken place in March 2019. This debate in fact took place on 19 March 2024.

A copy of this letter has been placed in the House of Lords library.

Yours ever,

A handwritten signature in black ink, appearing to read 'Ray Collins', written in a cursive style.

**Lord Collins of Highbury**  
**Parliamentary Under Secretary of State for Foreign, Commonwealth and**  
**Development Affairs**