

The Rt Hon. Boris Johnson MP  
First Lord of the Treasury

May 20, 2022

The Rt Hon. Simon Clarke MP  
Chief Secretary to the Treasury

The Rt Hon. Elizabeth Truss MP  
Foreign Secretary

Giles Thomson  
Director, Office of Financial Sanctions Implementation (OFSI) of HM Treasury

**Re: UK sanctions and internet access in Russia and Belarus**

Dear Rt Hon. Boris Johnson, Rt Hon. Simon Clarke, Rt Hon. Elizabeth Truss MP, and Director Thomson,

The signatories to this letter deplore Russia's invasion of Ukraine, condemn in the strongest possible terms the grave violations committed by Russian forces there, and appreciate efforts by the United Kingdom and other governments to respond with strong and targeted measures. However, we write to express our concerns about new sanctions that may interfere with the Russian people's access to the internet, which will obstruct attempts to organize in opposition to the war, report openly and honestly on events in Russia, and access information about what is happening in Ukraine and abroad.

New measures implemented by the UK may impact business between companies operating in the UK and Russian telecommunications firms like TransTelekom, and carry the unintended consequence of disrupting internet access in Russia. There is also increasing pressure, internally and externally, on information and communications technology vendors like internet, telecommunications, and cloud service providers to voluntarily restrict or block access by users in Russia. Already, for example, tech companies are withdrawing [paid applications and services](#), banning Russia [entirely](#), and [limiting services](#) to civil society under vague justifications. These measures could unnecessarily facilitate further repression by the Russian government in Belarus, Ukraine, and beyond.

Access to the internet is essential to the protection of freedom of expression, access to information, and free association, and is increasingly recognized as a human right. Journalism and independent media depend on access to secure and reliable information technologies to document events inside conflict-affected, fragile, and occupied areas, and to enable people to bypass state controls on information. Overly broad restrictions on the access of the Russian people to the internet would further isolate the embattled pro-democracy and anti-war activists, and impede the ability of NGOs, human rights groups, journalists, and attorneys inside and outside Russia to provide critical information to citizens about the current state of affairs and their rights. These actions would inadvertently speed up what the Kremlin has set out to achieve through its "sovereign internet" tools - a complete and total control of information space inside Russia.

Moreover, restricting access to foreign technology and communications platforms could further isolate the region and force users to rely on alternative and available services provided by Russian companies. These services are highly controlled by Russian authorities and have actively stifled independent channels of information through aggressive censorship and surveillance. In addition, these steps can drive individuals toward unauthorized or pirated versions of software and services that are likely to be vulnerable to hacking and surveillance.

For its part, Russia is likewise ramping up efforts to [block, throttle](#), and [commandeer](#) platforms and providers operating there. It has banned Facebook, Twitter, and over a dozen independent media, and has sent censorship notices to a number of foreign outlets including the Wikimedia Foundation, which hosts Wikipedia, threatening to block those services within Russia. We should work in every capacity to counteract those authoritarian actions and ensure that sanctions and other steps meant to repudiate the Russian government's illegal actions do not [backfire](#), by reinforcing Putin's efforts to assert information control.

We urge all actors considering steps that would limit internet access in the Russian Federation to carefully consider the full impact of such measures and their possible unintended consequences, and to act in a targeted, open, and strategic manner, consistent with international human rights principles of legality, legitimacy, necessity and proportionality.

In this respect, we built a coalition that [called upon](#) the US Treasury Department's Office of Foreign Assets Control (OFAC) to protect the free flow of information in Russia through **issuing a General License** authorizing the provision of services, software, and hardware necessary for personal communications over the internet, and robustly clarifying and disseminating notice

of this license to relevant stakeholders. On April 7, the US Dept. of Treasury answered our call, issuing [General License 25](#) under a [White House statement](#) noting:

We reiterate our commitment to exempting essential humanitarian and related activities that benefit the Russian people and people around the world: ensuring the availability of basic foodstuffs and agricultural commodities, safeguarding access to medicine and medical devices, and **enabling telecommunications services** to support the flow of information and access to the internet which provides outside perspectives to the Russian people. These activities are not the target of our efforts, and U.S. and Western companies can continue to operate in these sectors in Russia.

For these reasons, the UK and like-minded governments seeking to sanction the actions of the Russian Federation and its allies should take the following steps:

- **Issue a [General License](#)** to immediately exempt all sales, transfers, and transactions for hardware, software, technology, and services incident to the exchange of information over the internet from sanctions on Russia and Belarus;
- **Consult with civil society** actors and technology companies to understand the likely ramifications of potential sanctions;
- **Implement sanctions in a smart and targeted manner**, consistent with international human rights principles, including by providing clear guidance about how sanctions should be implemented in ways that protect human rights and humanitarian initiatives;
- **Be transparent about the justifications** for and impacts of sanctions, clarify how they are developed, and enable stakeholders to provide evidence on current and potential targets and measures;
- **Regularly review** and, if necessary, revise sanctions to ensure that they remain fit-for-purpose, in close consultation with civil society;
- **Include guidance** about potential sanctions removal and delisting, and the specific factors that will lead to the revision of sanctions; and
- **Apply a similar approach** to any potential sanctions on Belarus, as its role in the conflict evolves.

Thank you for your consideration of these important points. We are available to discuss and assist with any further efforts along these lines, as appropriate.

Signatories:

Access Now

ARTICLE 19: Global Campaign for Free Expression

Committee to Protect Journalists

Heartland Initiative

Open Rights Group

Ranking Digital Rights

The Wikimedia Foundation