Dear Tom,

Thank you for your letter of 11 December 2018 regarding autonomous sanctions that the UK could impose during the implementation period (IP).

The UK will remain bound by EU sanctions, and by the duty of sincere cooperation, during the IP. As I wrote previously, I am committed to ensuring that the government makes full use of its powers under the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act). The government is currently working to determine how we best take advantage of the powers provided by the Sanctions Act during the IP, in the context of the Withdrawal Agreement. This work is still ongoing, but I would be pleased to provide you with a fuller response at the appropriate point in the New Year.

The government’s top priority on sanctions preparation is to ensure that the legal framework is in place to implement sanctions. The government commenced certain provisions of the Sanctions Act in November 2018. These provisions will allow the government to lay regulations in Parliament to establish the structures and processes by which the Act will operate, and these will come into force in early 2019. The government will then introduce a series of regulations relating to specific sanctions regimes in the coming months, to provide the legal framework for the UK to implement EU and UN sanctions, and impose sanctions autonomously, in the future.

Further to my letter of 4 December 2018, and the reference to existing UK powers to impose sanctions in certain specific areas, such as counter-terrorism, the UK will retain these powers during an IP.

THE RT HON JEREMY HUNT MP