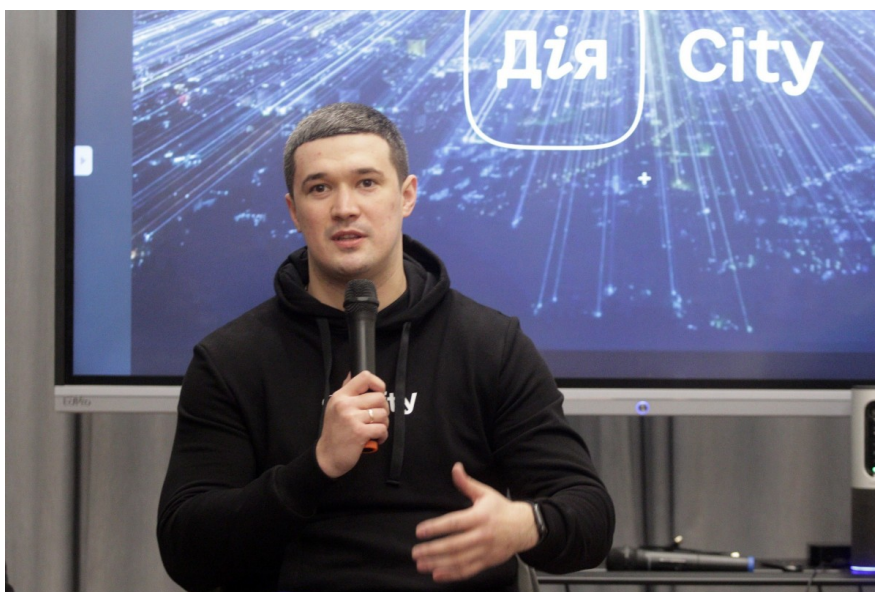


Concerns that cryptocurrencies are a sanctions-busting tool seem exaggerated, for now

Crypto providers have to apply the global sanctions regime against Russia like any other business. We don't see cryptocurrency as a major sanction evasion route today, though this could change in the future



Ukraine's Vice President, Mykhailo Fedorov, at an IT conference in Kyiv in December

Crypto companies are already required to enforce sanctions

Over the past week, we've seen the Ukrainian Vice Prime Minister, Mykhailo Fedorov, calling for a ban on crypto trading by all Russian-held wallet addresses. ECB president Christine Lagarde has called for a quick adoption of the EU's "Market in Crypto Assets" regulatory proposal. And EU finance ministers have been discussing the risk of sanctions evasion via crypto assets. Is all the attention for crypto assets in the context of sanctions enforcement justified?

To start with, like any other legal entity, crypto-asset service providers (or CASPs, in EU parlance) are obliged to apply sanctions. They have to freeze assets and bar transactions from sanctioned people and entities. Indeed several large crypto exchanges have indicated they are doing so. National supervisors in, for example, the EU, UK and US are tasked with monitoring compliance,

and you can read an example of that [here](#).

So far, financial sanctions have been targeted. While the [breadth and depth of sanctions are far-reaching](#) (in particular the freeze of the Russian Central Bank's reserves), no blanket ban has been issued on transactions with Russia. Cross-border payments, while severely curtailed, are still allowed under Western sanctions. [Not all Russian banks](#) are excluded from Swift, the global payment messaging service, at this stage. Sanctions certainly have severe repercussions impacting all Russians. Yet the point here is: thus far, Western policymakers have made the choice for sanctions not to apply fully across the board. From this perspective, as much as we understand the Ukrainian government having called for it, denying all Russians access to crypto services would not appear to be in line with the chosen sanctions approach so far.

That said, sanctions may change and some companies in other sectors did decide to (temporarily) halt business altogether with Russia. In addition, restrictions imposed by Russian authorities to limit capital outflows are another major hurdle to cross-border transactions by both businesses and private individuals.

The traceability of crypto transactions should not be underestimated

A different worry, discussed by EU finance ministers last week, is whether cryptocurrency is a significant loophole to evade sanctions and whether additional measures would be needed. Yet EU-based crypto companies are already subject to EU sanction law. While EU crypto asset regulation would be welcome for other reasons (we'll return to the topic of the EU's Markets in Crypto Assets Regulation in the near future), we struggle to see how accelerating crypto regulation in the EU would help sanctions enforcement.

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An entirely different matter is how to handle crypto service providers that are based in jurisdictions with less advanced crypto asset regulation. An inherently global digital ecosystem like crypto requires a coordinated global approach to regulation and supervision, establishing e.g. minimum standards and basic information exchange among supervisors. This was already on the [Financial Stability Board's agenda](#).

Yet even if CASPs in far-away jurisdictions turned a blind eye to sanctioned persons transacting on their platform, chances are that these transactions will, either in real-time or after the fact, be noticed. The same applies if intermediaries are avoided altogether by transacting using "self-hosted" wallets. As on-chain forensic research has become more advanced over the years, it is becoming progressively more difficult to hide on the blockchain which is keeping a perfect history of transactions for all to see. Coins can, with some effort, be traced back to the very last "satoshi", bitcoin's smallest unit. Recent reports of ransomware money being recaptured, and arrests made for crypto exchange hacks made years ago, attest to this progress. Hence we severely doubt whether cryptocurrency would allow a sanctioned person to transfer large sums of money in or out of Russia without it being noticed and responded to.

In the end, cryptocurrency markets may be a way for Russians to evade Western sanctions and/or Russian restrictions. But there are other ways too. Financial flows can, to a limited degree, be diverted to China and other jurisdictions that have not joined Western sanctions. Cash and gold could be carried across the border physically. From this perspective, imposing a generic ban on all Russians transacting on crypto exchanges seems inconsistent with sanction policies chosen in other areas.

Yet things are moving fast. Several western companies have made announcements of business closures that appear to go beyond what those sanctions require. Western sanctions themselves and their goals may evolve over time. Meanwhile, Russian countermeasures curtail the room for cross-border transactions too. So while the role of cryptocurrency in facilitating sanction evasion may appear limited today, that could change in the future.

Author

Alissa Lefebre

Economist

alissa.lefebvre@ing.com

Deepali Bhargava

Regional Head of Research, Asia-Pacific

Deepali.Bhargava@ing.com

Ruben Dewitte

Economist

+32495364780

ruben.dewitte@ing.com

Kinga Havasi

Economic research trainee

kinga.havasi@ing.com

Marten van Garderen

Consumer Economist, Netherlands

marten.van.garderen@ing.com

David Havrlant

Chief Economist, Czech Republic

420 770 321 486

david.havrlant@ing.com

Sander Burgers

Senior Economist, Dutch Housing

sander.burgers@ing.com

Lynn Song

Chief Economist, Greater China

lynn.song@asia.ing.com

Michiel Tukker

Senior European Rates Strategist

michiel.tukker@ing.com

Michal Rubaszek

Senior Economist, Poland

michal.rubaszek@ing.pl

This is a test author

Stefan Posea

Economist, Romania

tiberiu-stefan.posea@ing.com

Marine Leleux

Sector Strategist, Financials

marine.leleux2@ing.com

Jesse Norcross

Senior Sector Strategist, Real Estate

jesse.norcross@ing.com

Teise Stellema

Research Assistant, Energy Transition

teise.stellema@ing.com

Diederik Stadig

Sector Economist, TMT & Healthcare

diederik.stadig@ing.com

Diogo Gouveia

Sector Economist

diogo.duarte.vieira.de.gouveia@ing.com

Marine Leleux

Sector Strategist, Financials

marine.leleux2@ing.com

Ewa Manthey

Commodities Strategist

ewa.manthey@ing.com

ING Analysts

James Wilson

EM Sovereign Strategist

James.wilson@ing.com

Sophie Smith

Digital Editor

sophie.smith@ing.com

Frantisek Taborsky

EMEA FX & FI Strategist

frantisek.taborsky@ing.com

Adam Antoniak

Senior Economist, Poland

adam.antoniak@ing.pl

Min Joo Kang

Senior Economist, South Korea and Japan

min.joo.kang@asia.ing.com

Coco Zhang

ESG Research

coco.zhang@ing.com

Jan Frederik Slijkerman

Senior Sector Strategist, TMT

jan.frederik.slijkerman@ing.com

Katinka Jongkind

Senior Economist, Services and Leisure

Katinka.Jongkind@ing.com

Marina Le Blanc

Sector Strategist, Financials

Marina.Le.Blanc@ing.com

Samuel Abettan

Junior Economist

samuel.abettan@ing.com

Franziska Biehl

Economist, Germany

Franziska.Marie.Biehl@ing.de

Rebecca Byrne

Senior Editor and Supervisory Analyst

rebecca.byrne@ing.com

Mirjam Bani

Sector Economist, Commercial Real Estate & Public Sector (Netherlands)

mirjam.bani@ing.com

Timothy Rahill

Credit Strategist

timothy.rahill@ing.com

Leszek Kasek

Senior Economist, Poland

leszek.kasek@ing.pl

Oleksiy Soroka, CFA

Senior High Yield Credit Strategist

oleksiy.soroka@ing.com

Antoine Bouvet

Head of European Rates Strategy

antoine.bouvet@ing.com

Jeroen van den Broek

Global Head of Sector Research

jeroen.van.den.broek@ing.com

Edse Dantuma

Senior Sector Economist, Industry and Healthcare

edse.dantuma@ing.com

Francesco Pesole

FX Strategist

francesco.pesole@ing.com

Rico Luman

Senior Sector Economist, Transport and Logistics

Rico.Luman@ing.com

Jurjen Witteveen

Sector Economist

jurjen.witteveen@ing.com

Dmitry Dolgin

Chief Economist, CIS

dmitry.dolgin@ing.de

Nicholas Mapa

Senior Economist, Philippines

nicholas.antonio.mapa@asia.ing.com

Egor Fedorov

Senior Credit Analyst

egor.fedorov@ing.com

Sebastian Franke

Consumer Economist

sebastian.franke@ing.de

Gerben Hieminga

Senior Sector Economist, Energy

gerben.hieminga@ing.com

Nadège Tillier

Head of Corporates Sector Strategy

nadege.tillier@ing.com

Charlotte de Montpellier

Senior Economist, France and Switzerland

charlotte.de.montpellier@ing.com

Laura Straeter

Behavioural Scientist

+31(0)611172684

laura.Straeter@ing.com

Valentin Tataru

Chief Economist, Romania

valentin.tataru@ing.com

James Smith

Developed Markets Economist, UK

james.smith@ing.com

Suvi Platerink Kosonen

Senior Sector Strategist, Financials

suvi.platerink-kosonen@ing.com

Thijs Geijer

Senior Sector Economist, Food & Agri

thijs.geijer@ing.com

Maurice van Sante

Senior Economist Construction & Team Lead Sectors

maurice.van.sante@ing.com

Marcel Klok

Senior Economist, Netherlands

marcel.klok@ing.com

Piotr Poplawski

Senior Economist, Poland
piotr.poplawski@ing.pl

Paolo Pizzoli
Senior Economist, Italy, Greece
paolo.pizzoli@ing.com

Marieke Blom
Chief Economist and Global Head of Research
marieke.blom@ing.com

Raoul Leering
Senior Macro Economist
raoul.leering@ing.com

Maarten Leen
Head of Global IFRS9 ME Scenarios
maarten.leen@ing.com

Maureen Schuller
Head of Financials Sector Strategy
Maureen.Schuller@ing.com

Warren Patterson
Head of Commodities Strategy
Warren.Patterson@asia.ing.com

Rafal Benecki
Chief Economist, Poland
rafal.benecki@ing.pl

Philippe Ledent
Senior Economist, Belgium, Luxembourg
philippe.ledent@ing.com

Peter Virovacz
Senior Economist, Hungary
peter.virovacz@ing.com

Inga Fechner
Senior Economist, Germany, Global Trade
inga.fechner@ing.de

Dimitry Fleming
Senior Data Analyst, Netherlands
Dimitry.Fleming@ing.com

Ciprian Dascalu

Chief Economist, Romania
+40 31 406 8990
ciprian.dascalu@ing.com

Muhammet Mercan
Chief Economist, Turkey
muhammet.mercan@ingbank.com.tr

Iris Pang
Chief Economist, Greater China
iris.pang@asia.ing.com

Sophie Freeman
Writer, Group Research
+44 20 7767 6209
Sophie.Freeman@uk.ing.com

Padhraic Garvey, CFA
Regional Head of Research, Americas
padhraic.garvey@ing.com

James Knightley
Chief International Economist, US
james.knightley@ing.com

Tim Condon
Asia Chief Economist
+65 6232-6020

Martin van Vliet
Senior Interest Rate Strategist
+31 20 563 8801
martin.van.vliet@ing.com

Karol Pogorzelski
Senior Economist, Poland
Karol.Pogorzelski@ing.pl

Carsten Brzeski
Global Head of Macro
carsten.brzeski@ing.de

Viraj Patel
Foreign Exchange Strategist
+44 20 7767 6405
viraj.patel@ing.com

Owen Thomas

Global Head of Editorial Content
+44 (0) 207 767 5331
owen.thomas@ing.com

Bert Colijn
Chief Economist, Netherlands
bert.colijn@ing.com

Peter Vanden Houte
Chief Economist, Belgium, Luxembourg, Eurozone
peter.vandenhoute@ing.com

Benjamin Schroeder
Senior Rates Strategist
benjamin.schroeder@ing.com

Chris Turner
Global Head of Markets and Regional Head of Research for UK & CEE
chris.turner@ing.com

Gustavo Rangel
Chief Economist, LATAM
+1 646 424 6464
gustavo.rangel@ing.com

Carlo Cocuzzo
Economist, Digital Finance
+44 20 7767 5306
carlo.cocuzzo@ing.com