

**Congress of the United States**  
**Washington, DC 20515**

March 5, 2021

The Honorable Antony Blinken  
Secretary of State  
U.S. Department of State  
2201 C Street NW  
Washington, DC 20520

Dear Secretary Blinken:

We write to you to express deep concerns about the Biden Administration's implementation plans for the Nord Stream 2 sanctions required under the Protecting Europe's Energy Security Act (PEESA), as amended by the Protecting Europe's Energy Security Clarification Act (PEESCA).

Open-source reporting has cited numerous entities suspected of being engaged in sanctionable activity related to the Russian malign Nord Stream 2 pipeline project. However, we have been informed that the State Department requires additional information on these entities before it can issue any further sanctions designations. Critical to our ability to conduct Congressional oversight and to ensure adherence to the spirit and letter of the law is a clearer understanding of the "evidentiary threshold" the State Department is using when weighing additional sanctions designations under PEESA, as amended. Therefore, we ask not only for an assessment of the updated list of entities provided below that are believed to have engaged in sanctionable activity, but also more specifics on precisely what more information the State Department requires to make additional sanctions designations.

We are deeply concerned that the Administration's strong statements in opposition to the pipeline are not being matched by equally strong actions. Instead, it appears the Administration is talking tough while hiding behind an opaque "evidentiary threshold" to avoid the full implementation of mandatory Congressional sanctions as required by law. The Administration's recent decision to sanction only the Russian pipe-laying vessel "Fortuna" and its owner, KVT-RUS, which had both already been designated by the prior Administration, was emblematic of this troubling inconsistency.

We fear this discrepancy can only be explained by a desire to leave space for a backdoor deal with Germany. Any deal that does not stop the completion of Nord Stream 2 would be misguided. Moreover, if the Biden Administration agrees to a deal with Germany that trades away mandatory Congressional sanctions in exchange for a vague commitment to ensure Ukrainian gas transit or a promise to invest in European energy infrastructure, it would not only undermine U.S. and European security interests, but also represent an affront to Congress' Constitutional prerogatives. Finally, it would be extremely concerning if our other European allies and partners were not consulted on U.S. negotiations with Berlin on the pipeline, given that

the majority of Europe continues to oppose the completion of this Russian malign influence project. In particular, our strategic partner Ukraine and our Central and Eastern European allies must be consulted in earnest, not simply notified, on negotiations with Berlin.

To be clear, we support this Administration's efforts to reinvigorate the U.S.-German relationship. Strong bilateral relations with Germany are critical to U.S. national security interests. However, Nord Stream 2 is not simply an irritant in bilateral relations with Berlin. It is a Russian malign influence project that threatens to deepen Europe's energy dependence on Russia and, consequently, enhance the Putin regime's ability to exert political pressure throughout Europe. It would also allow the Putin regime to bypass Ukraine in exporting natural gas to Western Europe, decoupling the security of Ukraine from broader European security and rendering Kyiv more vulnerable to Russian aggression.

Given the shrinking window before the Nord Stream 2 pipeline's completion, we urge you to submit to Congress new sanctions designations *as soon as* the required information becomes available, rather than wait until May 17<sup>th</sup>, when the current 90-day reporting period ends and the next mandatory report to Congress is due. We believe this would be consistent with your Administration's rhetoric on the pipeline, including your comments at your confirmation hearing emphasizing that the Biden Administration was "determined to do whatever we can to prevent" the completion of the project.

Thank you in advance for your attention to this matter. We look forward to your swift reply and discussing further during your appearance on March 10<sup>th</sup> before the House Foreign Affairs Committee.

Sincerely,



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MICHAEL T. McCAUL  
Ranking Republican Member  
House Foreign Affairs Committee



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KEVIN McCARTHY  
House Republican Leader



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ADAM KINZINGER  
Member of Congress



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BRIAN FITZPATRICK  
Member of Congress



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AUGUST PFLUGER  
Member of Congress

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**Vessels reportedly engaged in pipe-laying or pipe-laying activities for Nord Stream 2 since January 1, 2021 that have not been sanctioned under PEESA, as amended**

*This information is drawn from open-source maritime vessel tracking data.*

Name: AKADEMIK CHERSKIY\*\*  
IMO: 8770261  
Flag: Russia  
Vessel Type: Pipelay Crane Ship

Name: IVAN SIDORENKO  
IMO: 9624213  
Flag: Russia  
Vessel Type: Offshore Supply Ship

Name: DP GEZINA  
IMO: 9295103  
Flag: Bahamas  
Vessel Type: Offshore Supply Ship

Name: GLOMARWAVE  
IMO: 9682617  
Flag: Panama  
Vessel Type: Accommodation/ROV Ship

Name: VLADISLAV STRIZHOV  
IMO: 9310018  
Flag: Russia  
Vessel Type: Icebreaker/AHTS Ship

Name: YURI TOPCHEV  
IMO: 933820  
Flag: Russia  
Vessel Type: Icebreaker/AHTS Ship

Name: HAVILA SUBSEA  
IMO: 9505508  
Flag: Norway  
Vessel Type: Offshore Supply Ship

Name: UMKA  
IMO: 9171620  
Flag: Russia  
Vessel Type: Offshore Supply Ship

Name: BALTIYSKIY ISSLEDOVATEL\*\*  
IMO: 9572020  
Flag: Russia  
Vessel Type: Supply/Sub-Sea Survey Support

Name: FINVAL  
IMO: 9272412  
Flag: Russia  
Vessel Type: Multi-Purpose Offshore Ship

Name: KATUN  
IMO: 9701126  
Flag: Russia  
Vessel Type: AHTS Ship

Name: MURMAN\*\*  
IMO: 9682423  
Flag: Russia  
Vessel Type: Supply/Sub-Sea Survey Support

Name: VENIE  
IMO: 9451654  
Flag: Russia  
Vessel Type: Offshore Supply Ship

Name: ARTEMIS OFFSHORE  
IMO: 9747194  
Flag: Russia  
Vessel Type: Offshore Supply Ship

Name: ERRIE  
IMO: 9474462  
Flag: Liberia  
Vessel Type: Offshore Supply Ship

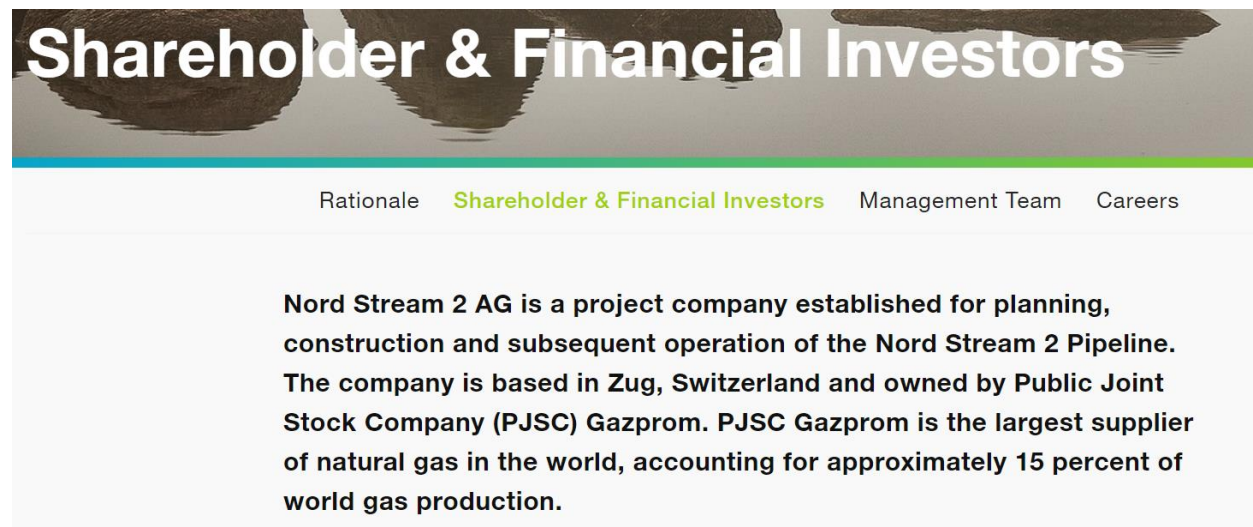
\*\*On March 4, 2021, the Danish Maritime Authority issued a [Notice to Mariners statement](#) on resumed pipelaying activities for Nord Stream 2 that said: “The work is being carried out from the pipelaying vessels »**FORTUNA**« (UBDP8) and »**AKADEMIK CHERSKIY**« (UDQB), assisted by the construction vessels »**BALTIYSKIY ISSLEDOVATEL**« (UBAQ4) and »**MURMAN**« (UBAN4), and other supply vessels.” While the **FORTUNA** has been sanctioned by the United States, the **AKADEMIK CHERSKIY**, **BALTIYSKIY ISSLEDOVATEL** and **MURMAN** have not been sanctioned under PEESA, as amended.

**Additional companies reportedly involved in Nord Stream 2’s construction that have not been sanctioned under PEESA, as amended**

Name: Nord Stream 2 AG

Country: Russia/Switzerland

Description: According to its website, Nord Stream 2 AG is the project company established for the planning, construction and subsequent operation of the Nord Stream 2 Pipeline.



The screenshot shows a website page with a dark header featuring the title "Shareholder & Financial Investors" in white. Below the header is a navigation menu with four items: "Rationale", "Shareholder & Financial Investors" (highlighted in green), "Management Team", and "Careers". The main content area has a light gray background and contains the following text:

**Nord Stream 2 AG is a project company established for planning, construction and subsequent operation of the Nord Stream 2 Pipeline. The company is based in Zug, Switzerland and owned by Public Joint Stock Company (PJSC) Gazprom. PJSC Gazprom is the largest supplier of natural gas in the world, accounting for approximately 15 percent of world gas production.**

Source: <https://www.nord-stream2.com/company/shareholder-and-financial-investors/>

Name: LLC Insurance Company Constanta

Country: Russia

Description: Insurance support for the project

Name: Russian Maritime Register of Shipping

Country: Russia

Description: Possible inspection and certification service provider