

EU releases 19th Sanctions Package Against Russia and Belarus

Overview of Key Measures

19 November 2025

On 23 October 2025, the European Commission adopted another set of sanctions against Russia and Belarus. The new package targets key sectors such as energy and finance, the military industrial base, special economic zones, as well as enablers and profiteers of Russia's aggression against Ukraine. It is noticeable that the new measures increasingly target third country companies outside of Russia. The EU legislator is trying to further reduce the risk of circumvention of the restrictions by extending the scope of important restrictions.

Sanctions against Russia

The new set of trade and sector related sanctions against Russia was implemented through [Council Regulation \(EU\) 2025/2041](#) which amends Regulation (EU) No 833/2014 (all subsequent references to Articles and Annexes are references to that Regulation, as amended). The most recent measures try to increase pressure on Russia's war economy by implementing, among others, the following:

Crucial measures in the energy sector

- Ban on imports of Russian liquefied natural gas (LNG) as of 25 April 2026. Long-term contracts concluded and last amended prior to 17 June 2025 are generally covered by the ban as of 1 January 2027.
- The new measures eliminate the exemption for Rosneft's and Gazprom Neft's oil and gas imports into the EU, making them subject to a full transaction ban.
- Chinese entities (including companies in Hong Kong) have been sanctioned based on the suspicion that they enabled Russia's revenue streams by buying significant amounts of Russian crude oil. This includes two refineries and an oil trader. All three have been listed in Annex I of the Regulation (EU) 269/2014, making them subject to the prohibition of making funds or economic resources available.
- 117 additional vessels of Russia's shadow fleet are now listed by the EU. They are subject to a port access ban and a ban on receiving services.

- In relation to the shadow fleet the new package targets Litasco Middle East DMCC, Lukoil's prominent shadow fleet enabler based in the United Arab Emirates (UAE), as well as maritime registries providing false flags to shadow fleet vessels. These companies have been added to Annex I of the Regulation (EU) 269/2014.
- The prohibition to engage in any transaction, directly or indirectly, with ports and locks listed in Annex XLVII has been extended. Part C of the Annex now includes ports and locks in third countries other than Russia. While Part C did not list any ports and locks yet, this measure is key to enable the EU to list ports in third countries that are instrumental to the Russian war efforts.

Financial Measures

- Five new banks in Russia are added to the transaction ban. No EU operator will be able to engage with any of the listed banks directly or indirectly.
- The EU has expanded the transaction ban that applies to legal persons, entities or bodies that are connecting to the system for transfer of financial messages ('SPFS') of the Central Bank of Russia or equivalent specialised financial messaging services set up by the Central Bank of Russia, to other payment services, such as the Russian National Payment Card System (in Russian, 'Mir') or the Fast Payments System ('SBP'). The measures also list four new financial institutions in Belarus and Kazakhstan that use the Russian payments system (SPFS), though it entails a grandfathering clause for contracts concluded prior to 24 October 2025.
- The new measures prohibit the use of specific cryptocurrencies (as named in Annex LIII) as they impose a risk of circumvention of the prohibitions in the Regulations (EU) 833/2014 and 269/2014, in particular transaction bans and asset freezes. The new measures also ban EU operators from providing crypto services and certain fintech services that enable Russia to develop its own financial infrastructure and possibly circumvent sanctions.
- The package expands the transaction ban on third-country credit and financial institutions and crypto-asset service providers to also include entities that provide payment services, and in particular entities that provide crypto-asset and payment services (including export financing) to listed entities. In order to fight against the proliferation of new entities that succeed the listed ones, it also expands the transaction ban to entities operating as a mirror or successor entity of the listed ones, when certain criteria are met (e.g. offering substantially identical content, overlapping ownership, control or management).

- In total, the Council considers 22 persons and 42 entities responsible for actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. These persons and entities have therefore been added to Annex I of Regulation (EU) No 269/2014, making them subject to restrictive measures.

Trade Measures

- The new package expands the prohibition to sell dual-use goods and technologies as well as goods and technology which might contribute to the technological enhancement of Russia's defence and security sector to 45 additional entities (as set out in Annex IV). Among the entities are certain entities in third countries other than Russia (12 in China, including Hong Kong, three in India and two in Thailand) that indirectly contribute to Russia's military and technological enhancement thereby enabling the circumvention of export restrictions, including on computer numerical controlled machine tools, on microelectronics, unmanned aerial vehicles, and other dual-use and advanced technology items.
- The package expands the prohibition of services under Article 5n now covering services in the field of space, specifically, commercial space-based services consisting of Earth observation or satellite navigation. In addition, Article 5n now expands the prohibition of services to artificial intelligence services consisting of access to models or to platforms for their training, fine-tuning and inference as well as high-performance and quantum computing. The prohibition now also restricts the provision of services directly related to tourism activities in Russia. This is done in order to reduce the revenues that Russia derives from such services and to deter the promotion of non-essential travel and leisure activities to Russia.
- Export restrictions on additional dual-use items and advanced technologies, including metals for the construction of military systems, electronic components, rangefinders, additional chemicals used in the preparation of propellants, and additional metals, oxides and alloys.
- The package imposed extensive export bans on items such as salts and ores, constructions materials, tyres, tubes, millstones and articles of rubber.
- The new rules also expand the import ban to certain items which generate significant revenues for Russia and which are necessary for the operation, maintenance or repair of ultra-violet lamps used for the disinfection of drinking water as well as to all acyclic hydrocarbons.
- In addition, in order to deprive Russia further of the means to sustain its aggression against Ukraine, the new regulations prohibit any new participation in, the creation of joint ventures with, and the provision of financing to, any enterprise

established in or operating through certain special economic, innovation or preferential zones, as well as prohibiting entering into new contracts with such enterprises. Moreover, the new regulations prohibit the maintenance in the above, while foreseeing exemptions to prevent undesirable effects.

Sanctions against Belarus

In addition to the Russia-related sanctions, the 19th package also includes [Council Regulation \(EU\) 2025/2041](#) which amended the Belarus sanctions Regulation (EC) 765/2006 to expand economic and individual measures that mostly parallel the Russia sanctions. This includes trade, financial and services-related provisions. Among others, the new sanctions mirror the provisions on providing crypto services as well as services in the field of space (specifically, commercial space-based services consisting of Earth observation or satellite navigation) artificial intelligence as well as high-performance and quantum computing. In addition, [Council Regulation \(EU\) 2025/2039](#) amends Annex I of Regulation (EC) 765/2006 and adds five new listings related to the Belarusian military-industrial complex and the Lukashenka regime.

BLOMSTEIN will closely monitor further developments and keep you informed. If you have any questions about the EUDR, [Roland Stein](#), [Florian Wolf](#), [Laura Louca](#) and [Tobias Ackermann](#), and the entire team is ready to assist you.

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