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EU sanctions against Russia and Belarus: twentieth package approved

Following several months of deadlock, the Council of the European Union has adopted the **twentieth package of restrictive measures against the Russian Federation**, accompanied by an **extension and alignment of the sanctions regime concerning Belarus**. The relevant amendments to Regulations (EU) No 269/2014 and No 833/2014 have already been published in the Official Journal of the European Union.

This package is particularly wide-ranging and represents the most significant expansion in terms of listings since the outset of the war, with **120 new designations**. The new framework addresses, among other areas, energy, maritime transport, the financial sector and crypto-assets, the military-industrial complex, trade in dual-use and “battlefield” goods, the protection of human rights and cultural property, media and diamonds, and for the first time formally activates the anti-circumvention tool and extends parallel measures to Belarus.

The following is a summary of the key developments of relevance to economic operators.

Energy Sector and Maritime Transport

The package introduces **36 new designations** concerning entities operating in the **upstream and downstream segments of the Russian energy sector**.

The **restrictive regime targeting the Russian “shadow fleet”** has been further expanded, with an additional 46 vessels now subject to a port access ban and restri-

ctions on the provision of maritime transport-related services.

Transactions with specific strategic port infrastructures are now prohibited, namely the Russian ports of Murmansk and Tuapse, as well as the oil terminal located at the port of Karimun (Indonesia).

Financial Sector and Crypto-assets

The package extends the transaction ban to an **additional 20 Russian credit institutions** and provides for the listing of four financial institutions established in third countries involved in the circumvention of EU sanctions or connected to the Russian financial messaging system (SPFS).

In light of Russia’s increasing reliance on **crypto-assets**, the EU has designated a Kyrgyz entity operating a platform for the trading of the A7A5 stablecoin and has introduced a comprehensive prohibition on engaging with providers and platforms established in Russia that enable the transfer and exchange of crypto-assets.

The package also introduces a prohibition on transactions related to the RUBx cryptocurrency, as well as a ban on any support for the development of the digital rouble.

Military-Industrial Complex and Dual-Use Goods

The EU sanctions list has been expanded through the designation of 58 companies and associated individuals involved in the development and production of military goods (including drones).

Notably, **16 entities established in third countries** (including China, the United Arab Emirates, Uzbekistan, Kazakhstan and Belarus) have been listed for supplying dual-use goods or military systems to Russia.

A further 60 entities are now subject to enhanced export restrictions on goods and technology that may contribute to the technological enhancement of Russia’s military capabilities, including entities located in third jurisdictions (such as China/Hong Kong, Türkiye and the United Arab Emirates).

Activation of the Anti-Circumvention Tool

For the **first time** since its introduction in 2023, the EU has formally activated its **anti-circumvention instrument** by prohibiting the export to Kyrgyzstan of computer numerical control (CNC) machine tools and radio equipment, due to the high risk of re-export to Russia.

Extension of Import and Export Restrictions

The package broadens **existing export prohibitions** to cover **additional categories of goods**, including laboratory glassware, certain high-performance lubricants and related additives, specific energetic materials, certain chemicals, rubber and articles made of vulcanised rubber, articles made of steel, tools for metal production and industrial tractors.

In parallel, **further restrictions on imports** have been introduced targeting goods capable of generating significant revenues for Russia, including certain raw materials, specific metals and minerals, scrap of steel and other metals, certain chemicals, articles of vulcanised rubber and tanned fur skins.

These measures are accompanied by a **strengthening of the transit ban** through Russian territory, aimed at preventing circumvention of restrictive measures. A quantitative quota has also been introduced for imports of ammonia.

Human Rights Violations and Misappropriation of Cultural Property

The twentieth package introduces additional designations targeting: *(i)* five individuals and one entity involved in human rights violations, and *(ii)* four individuals responsible for the misappropriation of Ukrainian cultural property.

Intellectual Property and Services

The package enhances the protection of EU companies by introducing: *(i)* **legal safeguards against infringements of intellectual property rights** and expropriation resulting from judicial decisions issued in Russia, and *(ii)* a prohibition on the provision of cybersecurity services to Russia.

Media and Diamonds

The existing **broadcasting restrictions** have been extended in scope in order to include websites replicating content of already sanctioned entities, with a view to preventing circumvention.

Traceability requirements in the diamond sector have been strengthened, requiring importers of polished diamonds to provide a due diligence statement certifying that such diamonds are not of Russian origin and have not been processed or produced in Russia.

Extension of Restrictive Measures to Belarus

The package also amends the **sanctions regime concerning Belarus**, introducing:

- i) (i) three new designations related to the Belarusian military-industrial complex and the Lukashenka regime; and
- ii) (ii) for the first time, the listing of a Chinese state-owned entity for its involvement in the production of Belarusian military goods.

Furthermore, **measures mirroring those adopted against Russia** have been introduced, particularly in the areas of trade, financial services, crypto-assets, legal protection and restrictions on the provision of services (including cybersecurity and tourism services).

In conclusion, the twentieth package significantly expands the subjective scope (new EU designations) and objective scope (new categories of goods, services and activities) of restrictions against Russia and Belarus, with particular attention to circumvention through third countries, the use of crypto-assets and global supply chains (including diamonds and sensitive technological components).

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