

## PACKAGE NUMBER 19 OF SANCTIONS AGAINST RUSSIA

In the wake of the recent escalation of aggression against Ukraine, the Council of the European Union (hereinafter referred to as the EU), on **23 October 2025**, published the **19th package of sanctions against Russia**, as well as Belarus. The focus is on the energy and financial sector, including cryptocurrency providers, but also entities and individuals in third countries.

Likewise, sanctions are once again tightened in the main sectors that constitute the economic sources that sustain the war in Ukraine. In particular, these are the energy, financial, military and commercial sectors, and controls on diplomats on the territory of the Union are also being strengthened. On the other hand, new natural persons are added, as well as financial institutions and companies related to the prohibitions or sanctions contained in the regulations and decisions published by the Council of the EU.

The main sanctions by sector are detailed below, with special emphasis on their impact on foreign trade, the export of military equipment and the restriction of dual-use products and technologies.

### ENERGY SECTOR

This package introduces a **ban on imports of liquid natural gas (LNG)** into the territory of the Union. In addition, the EU extends the framework of restrictions applicable to Russian oil

manufacturers, such as *Rosneft*, *Gazprom Neft*, and also adds *Tatarstani* to the list.

These sanctions also affect **Chinese, Emirati** and other entities that carry out activities in support of **the Russian military effort**, as well as maritime registries that issue false flags to vessels in the so-called *Russian shadow fleet*.

An **additional 117 vessels are added to the list**, bringing the number of sanctioned vessels to 557. In addition, a new prohibition on re-insuring ships belonging to *the shadow fleet in* order to limit their operations is introduced.

### FINANCIAL SECTOR

In this sector, new sanctions are introduced, and for the first time, against **cryptocurrencies**, in particular, against the *stablecoin A7A5*, backed by the Russian ruble, and the platform related to it. This is due to the growing use to evade sanctions, being considered one of the **key tools to finance the war**. In this context, a platform for buying and selling in Paraguay has been discovered, which is also sanctioned. In this way, the EU is trying to close all legal loopholes that could be exploited.

European operators are also **prohibited from providing cryptocurrency services** that possibly allow Russia to develop its own financial infrastructures and thereby circumvent sanctions.

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On the other hand, European operators will not be able to carry out any transaction, direct or indirect, with Russian banks. Likewise, **eight banks and oil operators** from Tajikistan, Kyrgyzstan, the United Arab Emirates and Hong Kong, associated with the circumvention of sanctions, are sanctioned.

Finally, this sector includes measures that prohibit **transactions through the Russian National Payment Card System** (MIR) and the **Rapid Payment System** (SBP), as well as with financial institutions that use the Russian payment system (SPFS).

Of particular note are **the restrictions on maintaining economic relations** with entities active in nine **special economic zones** on Russian territory, in which enterprises engaged in the production or development of military equipment operate.

### COMMERCIAL SECTOR

The list of **entities** is expanded by 45, all of them **directly linked to support for the war** in Ukraine. In this sense, the focus is on **exports** of computerized numerical control (CNC) machine tools, microelectronics, unmanned aerial vehicles, among others. These entities will be subject to **stricter** export restrictions on dual-use items and items that develop defence technology.

On the other hand, **additional export restrictions** are implemented that mainly affect electronic components, rangefinders, chemicals used in propellants, certain metals and oxides, alloys used in military systems, among others.

However, the EU has also decided to extend the **export ban** currently in force, to include an extensive list of products, including salts and minerals, rubber products, tyres, tubes and even construction materials. According to the Council, in 2024 these exports reached a value of 155 million euros. As a novelty, this package introduces a **ban on the purchase and transfer of all acyclic hydrocarbons**, given their high importance to the Russian economy.

### MILITARY SECTOR

This sector incorporates new sanctions aimed at businessmen and entities that support the Russian military-industrial complex. However, not all of those sanctioned come from Russia; operators from the United Arab Emirates and China are also sanctioned for supplying military goods and materials and dual-use products to Russia.

### SERVICES

Finally, the sanctions put under scrutiny **all services related to artificial intelligence** (hereinafter, AI), **high-performance computing**,

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**commercial space services**, as well as **tourism services** provided by European economic operators on Russian territory.

strategic assets and key sectors of the Russian economy.

## BELARUS

Analogous to the previous package, the new **sanctions against Russia apply directly to Belarus**. In addition, they also include five new measures related to the Belarusian military exercise and Lukashenko's regime.

## CONCLUSION

In short, the sanctions against Russia and Belarus substantially increase the pressure on the Russian economy, focusing on the key sectors and the main sources of financing for the war in Ukraine. This package has a wider scope and stricter application. Sanctions on the energy sector represent the most severe sanctions. Likewise, for the first time, and after a notable growth in its use, sanctions related to cryptocurrencies are imposed. Likewise, the ban on exports of dual-use goods and military equipment seeks to disrupt the supply chains that supply the Russian military-industrial complex, preventing indirect re-export through third countries. The tightening of customs and financial controls demonstrates the EU's intention to close the loopholes that allowed sanctions to be circumvented. Definitely, the new sanctioning framework consolidates a policy of comprehensive control over



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