

PACKAGE NUMBER 20 OF SANCTIONS AGAINST RUSSIA

Following the continuation and intensification of the Russian Federation's aggression against Ukraine, **the Council of the European Union (hereinafter referred to as the EU), on 23 April 2025, published the 20th package of sanctions against Russia and Belarus.**

The new package significantly strengthens the restrictive measures already in place, focusing on the energy, financial — including crypto-assets and central bank digital currencies — commercial, military-industrial and services sectors, as well as on entities and operators located in third countries that facilitate the circumvention of international sanctions.

The sanctions are once again tightened in the key sectors that constitute the economic and technological sources supporting Russia's war effort in Ukraine. In particular, the restrictions on hydrocarbon transport, financial services, crypto-asset transactions, dual-use goods, high-priority items and supply chains linked to Russia's military-industrial complex are reinforced.

Furthermore, the list of natural persons, financial entities, companies and operators subject to the prohibitions or sanctions set out in the recently published EU Council Regulations and Decisions has been expanded. Specifically, the Council has adopted a package comprising **120 new listings** and new economic sanctions

targeting key sectors that fuel Russia's war of aggression against Ukraine.

The main sanctions by sector are set out below, with particular emphasis on their impact on foreign trade, the financial sector, the export of sensitive material and restrictions on dual-use goods and technologies.

ENERGY SECTOR

This package introduces new restrictions aimed at reducing Russia's energy revenues. In particular, it establishes the basis for a future prohibition on maritime services related to Russian crude oil and petroleum products, in coordination with the G7 and the Price Cap Coalition.

The package also amends the price cap applicable to Russian crude oil and petroleum products, providing that, following the relevant Council decision, a total prohibition on maritime services linked to such products may be activated.

It also includes new designations affecting operators in the Russian energy sector, including entities active in oil exploration, extraction, refining and transport. The measures against the so-called "shadow fleet" are also strengthened, with new restrictions targeting vessels, maritime insurers and operators that facilitate the circumvention of the price cap mechanism.

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In this regard, **46 additional vessels** are added to the list of vessels subject to port access bans and to restrictions on the provision of certain maritime transport-related services, bringing the total number of designated vessels to **632**. In addition, certain transactions with the Russian ports of **Murmansk** and **Tuapse**, as well as with the **Karimun** oil terminal in Indonesia, are prohibited due to their use in illegal or high-risk maritime transport practices.

The package also introduces a prohibition on providing liquefied natural gas (LNG) terminal services to Russian entities or to entities owned or controlled by Russian nationals or operators. The contracts affected by this measure will automatically terminate on **1 January 2027**.

FINANCIAL SECTOR AND CRYPTO-ASSETS

In the financial sector, the package strengthens the prohibitions on transactions with Russian banking and financial entities, as well as with certain third-country entities that facilitate the circumvention of sanctions or maintain connections with the Financial Messaging System of the Central Bank of the Russian Federation.

In particular, the package imposes a transaction ban on **20 Russian banks and four financial entities located in third countries**, due to their contribution to the financing of Russia's war effort or

their role in facilitating alternative payment channels.

As a notable development, the restrictions relating to crypto-assets and digital currencies are expanded. It is prohibited to participate, directly or indirectly, in any transaction involving listed central bank digital currencies, such as the **digital rouble**, as well as to provide any type of support for the development of such projects.

In addition, it is prohibited to participate in transactions with crypto-asset service providers or exchange platforms established in Russia, due to the risk that such structures may be used to circumvent international financial sanctions. This prohibition will apply from **24 May 2026**.

The package also addresses new forms of financial circumvention through clearing, settlement, reconciliation or netting mechanisms, particularly where they enable international transactions without traditional cross-border payments. For these purposes, new entities are added to the sanctions lists, including **Arneis, Asia Import Group, GPAgent and Platejka**, with effect from **14 May 2026**.

TRADE SECTOR

In the area of trade, the EU expands both export and import restrictions on certain goods.

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On the one hand, the prohibition on the export of goods that may contribute to the enhancement of Russian industrial capacities is reinforced, including chemicals, rubber and vulcanised rubber articles, steel articles, tools for metal production and industrial tractors.

The list of items that may contribute to Russia's military and technological enhancement or to the development of its defence and security sector is also expanded. These items include laboratory glassware, certain high-performance lubricants and their additives, as well as energetic materials.

On the other hand, new import restrictions are introduced on goods that generate significant revenue for Russia, including certain raw materials, metals, minerals, steel and other metal waste, chemicals, vulcanised rubber articles and tanned or dressed furskins.

In order to minimise the risk of circumvention, the list of goods and technologies subject to the prohibition on transit through Russian territory is also expanded. This measure is particularly relevant for European economic operators involved in international logistics chains or foreign trade operations with third countries.

As an additional measure, traceability obligations for polished diamonds are strengthened, requiring importers to provide a due diligence declaration

confirming that such diamonds were not mined, processed or produced in Russia.

MILITARY AND INDUSTRIAL SECTOR

The package reinforces measures targeting Russia's military-industrial complex by listing new entities and operators directly or indirectly involved in the development, manufacture or supply of military equipment, dual-use goods and critical technologies.

In particular, **60 entities** are added to the list of legal persons, entities or bodies subject to stricter export restrictions on dual-use goods and technology, as well as goods and technology that could contribute to the technological enhancement of Russia's defence and security sector. These entities include operators located in third countries other than Russia, including China, Hong Kong, Türkiye and the United Arab Emirates.

The EU places particular emphasis on the export of computer numerical control machinery, microelectronics, components for unmanned aerial vehicles, maritime equipment and other components for vehicles and machinery, given their potential use in Russia's military industry.

New natural persons and entities responsible for actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine are also listed, including operators linked to

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the supply of drones, software, satellite services, maritime security and other services supporting Russia's military apparatus.

SERVICES, MEDIA AND LEGAL PROTECTION MEASURES

The package expands the restrictions applicable to the provision of services to the Government of Russia and to legal persons, entities or bodies established in Russia.

In particular, the provision of **managed security services** is prohibited, as such services may contribute to enhancing Russia's technological capabilities. This prohibition will apply from **25 May 2026**.

The broadcasting ban is also expanded to include not only media outlets already subject to sanctions, but also entities or platforms that reproduce or mirror their content with the aim of circumventing the restrictive measures. This measure does not prevent the media outlets concerned or their staff from carrying out activities in the Union other than broadcasting, such as research or interviews.

Furthermore, legal safeguards are strengthened to protect European operators against claims relating to contracts or transactions affected by sanctions. In particular, the prohibition on satisfying claims brought by persons, entities or bodies established in third countries is expanded where such claims are linked to goods, technologies or services

whose sale, supply, transfer or export is prohibited.

New measures are also introduced in response to the illegitimate expropriation of assets and intellectual property rights of European operators in Russia, empowering the Council to impose transaction bans on Russian entities benefiting from so-called "*temporary management*" or from the unauthorised use of intellectual property rights and trade secrets.

BELARUS

In parallel, the package continues to address the role of Belarus in facilitating Russia's war of aggression against Ukraine. In this regard, **three new legal persons** are added to the Belarus sanctions regime: **Volat-Sanjiang Joint Venture Limited Liability Company, CJSC Belarusian Oil Company**— also known as **BelOil** or **BNK**— and **China Space Sanjiang Group**.

Volat-Sanjiang Joint Venture Limited Liability Company is a Belarusian joint venture that manufactures wheeled chassis for military equipment, including multiple rocket launcher systems. China Space Sanjiang Group is listed as a co-founder and one of the main partners of that joint venture, participating in the development and production of military technology and equipment.

CJSC Belarusian Oil Company is identified as the main oil exporter of Belarus and as

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an entity controlled by the Belarusian Government, linked to companies such as Belorusneft and Naftan.

These measures increase pressure on the Lukashenka regime and on entities that contribute to the Belarusian military-industrial complex or indirectly support Russia's aggression against Ukraine.

CONCLUSION

This 20th sanctions package substantially reinforces the economic, financial and technological pressure on Russia and Belarus, focusing on the strategic sectors that sustain the war of aggression against Ukraine.

The new measures in the energy sector seek to reduce oil-related revenues and limit the operation of the shadow fleet, while also restricting the provision of services linked to LNG and to ports used to circumvent the price cap.

In the financial sector, the listing of new banking entities and the expansion of restrictions on crypto-assets, Russian exchange platforms and central bank digital currencies represent a further step in controlling alternative financing and payment channels.

The tightening of restrictions on dual-use goods, sensitive technologies, industrial machinery, microelectronics and drone components is aimed at disrupting the supply chains that feed Russia's military-

industrial complex, while preventing indirect re-export through third countries.

Finally, the new measures concerning Belarus demonstrate the EU's willingness to sanction not only Russia, but also the operators, entities and regimes that facilitate or support its military aggression.

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