

This appendix is not a legally valid document. The only legally valid documents are the sanctions regulations published in the Official Journal of the European Union. This appendix is a non-exhaustive digest of new statutory amendments.

Sanctions against Russia:

Individual sanctions (Council Regulation (EU) No 269/2014)

The first part of the latest package concerns individual sanctions imposed for actions that undermine or threaten the territorial integrity, sovereignty and independence of Ukraine.

The 20th sanctions package contains 117 listings (37 natural persons and 80 entities) involved in actions undermining or threatening Ukraine's territorial integrity, sovereignty and independence.

Sectoral sanctions (Council Regulation (EU) No 833/2014)

Secondly, the EU expands the sectoral (or economic) sanctions adopted in view of Russia's actions destabilising the situation in Ukraine. The key changes to sectoral sanctions are described below.

Export and import bans

New items, such as **laboratory glassware, certain high performance lubricants and their additives**, and **energetic materials**, are added to the export ban list of goods and technology which might contribute to Russia's military and technological enhancement or the development of its defence and security sector.

The EU also adds **60 new listings** of sanctioned persons, entities and bodies that are military end-users, part of Russia's military and industrial complex or have commercial or other links with Russia's defence and security sector or otherwise support it. This export ban list includes, among others, operators in third countries that enable the circumvention of export restrictions, including those on computer

numerical controlled machine tools, microelectronics, components for unmanned aerial vehicles and maritime equipment.

Further restrictions are imposed on the export of goods that contribute to enhancing Russian industrial capacities, such as chemicals, rubber and articles of vulcanised rubber, articles of steel, tools for metal production and industrial tractors. These products are also subject to a prohibition on transit via the territory of Russia. **An import quota is set for ammonia.**

In addition, the EU expands the list of products that generate significant revenues for Russia. Import bans are extended to cover a wider range of raw materials, metals, minerals, scrap of steel and other metals, chemicals, articles of vulcanised rubber, and tanned fur skins.

The EU is activating the **anti-circumvention mechanism** for the first time. The new restrictions apply to the Kyrgyz Republic and two combined nomenclature (CN) codes: machining centres for working metal and machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus. These products may therefore not be exported to the Kyrgyz Republic (Article 12f).

Under the 20th sanctions package, importers of polished diamonds (including diamonds polished in third countries) are required to submit a due diligence statement confirming that the diamonds have not been mined, processed or produced in Russia.

Liquefied natural gas (LNG) and oil

The EU prohibits the provision of liquefied natural gas (LNG) terminal services to Russian companies or entities owned or controlled by Russian nationals or operators. Previously concluded contracts for LNG terminal services will terminate automatically on 1 January 2027.

In addition, a restriction is imposed on the provision of services to LNG tankers that are Russian flagged, owned or controlled.

Under the 20th sanctions package, the EU decided on the possibility of imposing a **full ban on maritime services** related to the transport of Russian crude oil and petroleum products. The introduction of the maritime services ban still requires a separate decision on implementation. The ban would replace the current oil price cap. The EU will closely coordinate the introduction of the maritime services ban with the Price Cap Coalition and the G7. (Article 3n)

The EU is also extending the list of partner countries for the import of petroleum products.

Sanctions against Russia's shadow fleet

The EU lists 46 vessels belonging to the shadow fleet as subject to sectoral sanctions. In the context of sectoral sanctions, the term shadow fleet is used for vessels that transport goods for use by the Russian arms industry or carry Russian crude oil, petroleum products or mineral products and fail to comply with shipping recommendations adopted by the International Maritime Organization (IMO). With the latest additions, the total number of sanctioned shadow fleet vessels rises to well over 600.

To ensure that tankers sold by EU operators do not end up in the Russian shadow fleet, the conditions applied to the sale of tankers to third-country operators are tightened. Sales contracts must include a mandatory clause banning the resale or retransfer of tankers to Russian operators or for use in Russia. In addition, a new derogation will be introduced to facilitate the recycling of vessels.

Sanctions against the financial sector

The EU delists two Chinese banks on the transaction ban list because the banks have taken action to prevent the circumvention of sanctions (Annex XLV). The EU also adds 27 new listings to the scope of the transaction ban (Annexes XIV, XLIV and XLV). EU operators are prohibited to directly or indirectly engage in any transaction with an entity on the list.

The Central Bank of the Russian Federation is introducing a digital rouble that is expected to become a common method of payment among Russian operators and between them and operators in third countries in the coming years. The EU prohibits participation in transactions related to this central bank digital currency, or the provision of support for such a project. Existing contracts must be terminated within the prescribed time limit.

The EU expands the list of **crypto-assets** the use of which is prohibited in transactions. Under the 20th sanctions package, it is prohibited to engage with any crypto-asset service provider established in Russia and use any platform established in Russia that facilitates the transfer and exchange of crypto-assets.

Other changes to Council Regulation (EU) No 833/2014

With the 20th sanctions package, two new ports and locks in Russia (Murmansk and Tuapse) and one port and lock in Indonesia (Karimun Oil Terminal) are added to the transaction ban. It is prohibited to engage directly or indirectly in any transaction with these ports (Article 5ae).

The 20th sanctions package introduces new restrictions on ice-breakers operating in Russia because the vessels are instrumental in supporting oil and gas exports from northernmost Russia. This prohibition applies to, for example, the provision of various services to ice-breaker vessels (Article 3sa).

The EU has previously restricted the movement of Russian diplomats and their family members across the EU. The related prior notification mechanism will be amended to require these individuals to always carry a visa issued to them (Article 5v).

The prohibition of service provision is expanded to encompass **managed security services**. In addition, the requirement for prior authorisation regarding diplomatic representation of Russia is amended (Article 5n).

The existing content broadcasting prohibition is expanded to entities which mirror the content of other entities that are already subject to the prohibition, in order to tackle attempts to circumvent sanctions (Article 2f).

The EU introduces new measures related to defending EU firms in sanctions-related matters. A new exemption option allows frozen assets to be released for payment of costs related to arbitral proceedings. The package allows EU firms to claim damages in the EU in case of enforcement of sanctions-related judgments in third countries.

Sanctions against Belarus

The EU adds 3 new listings to the list of sanctions against Belarusian individuals (Council Regulation (EC) No 765/2006, Annex I).

The list of sectoral sanctions against Belarus is extended significantly. The export ban list against Belarus is expanded and harmonised with the corresponding list against Russia by adding goods and technology which might contribute to

Belarus's military and technological enhancement or to the development of its defence and security sector. (Council Regulation (EC) No 765/2006, Annex Va).

Similarly, the EU harmonises the list of goods subject to export and transit restrictions to include items which could contribute to the enhancement of Belarusian industrial capacities.