

## EU's 18th sanctions package, 18.7.2025

*This appendix is not a legally binding document. The legally binding sanctions regulations are published in the Official Journal of the European Union. The appendix contains a summary of the new legislative amendments, but the summary is not exhaustive.*

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### **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 new names added in the 18th package include business persons, entities and bodies supporting or benefitting from the Russian Government. The new additions include persons, entities and bodies who have facilitated the illegal annexation of Ukrainian territories into Russia and companies that have supported Russia's armed forces and arms industry. Russian companies as well as companies from other countries have supported materially Russia's military actions against Ukraine. New names added to the sanctions list also include companies that have circumvented sanctions and facilitated the shadow fleet. These companies originate from several countries, including Russia, China, Hong Kong, India, Iran, Singapore, the United Arab Emirates, Azerbaijan and Mauritius.

The EU adds to the list of individual sanctions persons and entities that are part of Russia's shadow fleet, including the captain and shipping company of the tanker Jaguar.

#### **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 EU expands the sanctions list with persons, entities and bodies that are military end-users, part of Russia's military industrial complex or have commercial or other links with Russia's defence and security sector or otherwise support it.

#### **Sanctions against tankers from Russia's shadow fleet**

The EU imposes new sectoral sanctions against the shadow fleet in addition to the individual sanctions mentioned above. The EU lists 105 additional tankers that are part of the shadow fleet. The tankers listed are registered to Palau, Sierra Leone, and Panama, among other countries. The vessels subject to sectoral sanctions as part of the shadow fleet of tankers



transport goods for use by the Russian arms industry or carry Russian crude oil and petroleum 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 tankers is 444.

### **Prohibitions and restrictions on exports and imports**

New items, such as constituent chemicals for propellants, 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 (Annex VII, Article 2a). In addition, the ban on transit via the territory of Russia is extended to goods and technology already subject to an export ban, such as discharge and water-jet machine tools (Annex VII, Article 2a). The EU also adds 180 new CN codes to the export ban list of items which could contribute to the enhancement of Russian industrial capacities (Council Regulation (EU) No 833/2014, Annex XXIII, Article 3k). New additions include aluminium goods and other metal goods, various enzymes, plastics and chemicals and different kinds of machines, tools and measuring devices. The scope of the export ban is also extended to selling or providing software used in the banking and financial sector to the Russian Government or any legal person, entity or body established in Russia (Council Regulation (EU) No 833/2014, Article 5n).

Council Regulation (EU) No 833/2014 prohibits the import of petroleum products obtained in a third country from Russian crude oil. The Regulation specifies the partner countries which have a set of restrictive measures that are substantially equivalent to those imposed by the Union on Russian petroleum products and from which importers are not required to provide evidence of the origin of crude oil. These include Canada, Norway, the United States, the United Kingdom and Switzerland (Council Regulation (EU) No 833/2014, Article 3ma, Annex LI). Petroleum products imported from countries which are net exporters of crude oil are considered to have been obtained from domestic crude oil and not from crude oil originating in Russia, unless a competent authority has reasonable grounds to believe that they have been obtained from Russian crude oil. Providing technical or financial assistance, brokering services, insurance or reinsurance in relation to the above-mentioned petroleum products is prohibited (Council Regulation (EU) No 833/2014, Article 3ma).

In addition, the exemption on crude oil delivered by pipeline stopped applying to the Czech Republic on 1 July 2025 (Council Regulation (EU) No 833/2014, Article 3m(3)(b)).

### **Transaction bans**



Council Regulation (EU) No 833/2014 bans any transaction that is directly or indirectly connected to the natural gas pipelines Nord Stream 1 and Nord Stream 2 and that concerns the completion, operation, maintenance or use of the pipelines. The transaction ban also applies to the financing of any such transactions. (Council Regulation (EU) No 833/2014, Article 5af)

In future, it will be possible to add to the transaction ban list any entity established outside Russia that uses the SPFS of the Central Bank of Russia (Council Regulation (EU) No 833/2014, Article 5ac(2)). The criteria for imposing a transaction ban on financial institutions or entities providing crypto assets services is also extended. Furthermore, any legal persons, entities or bodies established outside the Union and engaged in oil trade that circumvent the prohibitions set out in Council Regulation (EU) No 833/2014 can be included in the scope of the transaction ban. (Council Regulation (EU) No 833/2014, Article 5ad) In future, it will be prohibited to engage in transactions with the Russian Direct Investment Fund (RDIF) or entities in which the RDIF or the entities controlled by it have invested. (Council Regulation (EU) No 833/2014, Article 5ag)

In addition, the existing prohibition to provide specialised financial messaging services, which are used to exchange financial data ('de-SWIFTing'), to anyone in Russia is expanded into a transaction ban. (Council Regulation (EU) No 833/2014, Article 5h)

The EU specifies the ban on transactions by subsidiaries of Russian companies operating in the EU. The prohibition to engage in transactions with certain legal persons, entities or bodies established in Russia that are listed in Council Regulation (EU) No 833/2014 is clarified: the prohibition does not apply to entities established in the Union and acting on behalf of or at the direction of the listed entities, provided that competent authorities have imposed a public trusteeship or similar public firewall measure or authorised a similar firewall measure to ensure compliance with restrictive measures (Council Regulation (EU) No 833/2014, Article 5aa(2f)).

Transport restrictions regarding coal and nuclear power are alleviated. An exemption from the transaction ban on ports and locks allows transactions for the transport of coal through such ports and locks when it originates in a country other than Russia and is only being loaded in, departing from or transiting through Russia (Council Regulation (EU) No 833/2014, Article 5ae(3)(g)). The transaction ban would not apply to the airports that fall within the scope of Council Regulation (EU) No 833/2014 in so far as the transactions would be essential for civil nuclear facilities (Council Regulation (EU) No 833/2014, Article 5ae(4)(g)).

### **Lowering the oil price cap**

The price cap applicable to crude oil originating in or exported from Russia, to be transported by sea, is tied to changes in the global market prices of Russian oil. At the initial stage, the new



price is set at USD 47.6 per barrel. The new price will be introduced with a 45-day transition period after the approval of the package.

In practice, this means that the exemption, referred to in Article 3n, paragraph 6, point (a), concerning the maritime transport of Russian crude oil to third countries and the prohibition to provide services related to such transport only applies when the purchase price per barrel does not exceed the price cap. (833/2014, Article 3n and Annex XXVIII).

### **Export control is tightened to prevent the circumvention of sanctions**

In the 18th sanctions package, the EU enables competent authorities to tighten the export control of sanctioned goods. Competent authorities may control the export of sanctioned goods to third countries where there is a credible risk that such items exported to third countries might ultimately be diverted to Russia. (Council Regulation (EU) No 833/2014, Article 2a(1aa) and (6a)).

### **Member States' possibilities to defend themselves in investor-state disputes**

The 18th package of sanctions deals with court, arbitral and administrative decisions issued in proceedings outside the EU with the aim of challenging EU sanctions. Member States should not recognise or enforce any injunction, order, relief, judgment of a court or an arbitral or administrative body outside the EU in connection with measures imposed under Council Regulation (EU) No 833/2014 or Council Regulation (EU) No 269/2014 (Council Regulation (EU) No 833/2014, Article 11(2a) and (2b)).

## **SANCTIONS AGAINST BELARUS**

The EU adds to the list of sanctions against Belarusian individuals four new entities and one natural or legal person. (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 and technologies which could contribute to the enhancement of Belarusian industrial capacities (Council Regulation (EC) No 765/2006, Annex



XVII and XIX).

It is prohibited to import from Belarus goods and technology listed in the Common Military List. (Council Regulation (EC) No 765/2006, Article 1aa).

The export control of sanctioned goods is tightened for Belarus in the same way as for Russia (the 'catch all' clause). Competent authorities may control the export of sanctioned goods to third countries where there is a credible risk that the items exported to third countries might be diverted to Belarus and from there to Russia. (Council Regulation (EC) No 765/2006, Article 1f)

In addition, the earlier prohibition to provide specialised financial messaging services, which are used to exchange financial data ('de-SWIFTing'), to anyone in Belarus is expanded into a transaction ban. (Council Regulation (EC) No 765/2006, Article 1zb)

The EU has imposed sanctions against Belarus since 2004. It has substantially expanded its sanctions after the fraudulent presidential elections in 2020 and the start of Russia's war of aggression in 2022. The current individual sanctions list holds 311 natural or legal persons and 50 entities. Belarus is also subject to an arms embargo and a ban on the overflight of EU airspace and on access to EU airports by Belarusian carriers. The previous extension of sanctions against Belarus and their harmonisation with those against Russia was decided by the EU in February 2025 (Council Decision (CFSP) 2025/394). New sanctions against Belarusian individuals were most recently adopted in March 2025.