

# The 16th sanctions package against Russia



Trade  
Compliance

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On 24 February 2025, the third anniversary of Russia's attack on Ukraine, the European Union adopted the 16th sanctions package against Russia. We present the main provisions of the 16th sanctions package.

### **1. Extension of personal restrictions**

Through Implementing Regulation (EU) 2025/389, the EU added 48 natural persons and 35 entities to the list of natural and legal persons, entities and bodies ("PEB") in Annex I of Regulation (EU) 269/2014. As a result, the assets of the newly listed natural persons and entities are frozen. Furthermore, neither funds nor economic resources may be made available to them.

### **2. Extension of the list of ships of the so-called "shadow fleet"**

A further 74 vessels were added to Annex XLII of the Russia-Embargo-Regulation (EU) No 833/2014 ("REG 833/2014"). This means that a total of 153 vessels are now listed in Annex XLII of REG 833/2014. These are said to be vessels of Russia's so-called "shadow fleet", which is used, among other things, to circumvent the oil price cap.

### **3. Further listings in Annex IV of REG 833/2014**

53 companies were added to Annex IV of REG 833/2014. Only one third of the 53 newly listed companies are based in Russia. The majority is based in other third countries, namely China (including Hong Kong), India, Kazakhstan, Singapore, Turkey, the United Arab Emirates and Uzbekistan. The listing in Annex IV results in particular in a ban on selling, supplying and exporting dual-use goods and goods listed in Annex VII of REG 833/2014 to these PEB.

### **4. Ban on imports of Russian primary aluminum**

Annex XI of REG 833/2014 was amended to include unwrought aluminum of HS code 7601, so that it is now also prohibited in relation to primary aluminum to purchase, import or transfer into the Union, directly or indirectly, primary aluminum if it originates in or has been exported from Russia. However, exemptions linked to import quotas apply for a transitional period until 26 February 2026.

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## **5. Expansion of export bans**

Annexes VII and XXIII of REG 833/2014 were expanded. In particular, dual-use chemical precursors, chromium ores and chromium compounds, software in connection with numerically controlled machine tools (so-called CNC machines) and video game controllers for controlling drones on the battlefield are now also covered.

## **6. New transaction bans**

A transaction ban applies to ports, locks and airports listed in Annex XLVII Part A and Part B of REG 833/2014. In addition, the transaction ban in relation to credit or financial institutions that use the Russian Central Bank's System for the Transmission of Financial Messages (SPFS) to circumvent sanctions was triggered by including three banks in Annex XLIV of REG 833/2014 for the first time.

## **7. Prohibition on construction services**

Art. 5n (2) REG 833/2014 was amended to include construction services. This means that EU companies are now prohibited from providing construction services to the Russian government or legal persons, entities or bodies established in Russia. The General Export Authorization ("GEA") No 42 continues to apply, but for the time being not in relation to the newly introduced prohibition on construction services.

## **8. New sanctions against Belarus**

The sanctions against Belarus laid down in REG 765/2006 were also expanded. The changes essentially correspond to the above-described tightening of the sanctions against Russia.

## **9. Occupied Ukrainian territories**

Both with regard to Russian-occupied areas in the Kherson, Donetsk, Luhansk and Zaporizhzhia regions, as well as in relation to Crimea and Sevastopol, it is now prohibited to sell, supply, transfer or export banknotes of an EU Member State to these territories, to PEB in these territories or for use in these territories. GEA No 42 does not apply here.

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Furthermore, best efforts obligations corresponding to Art. 8a REG 833/2014 with regard to third-country subsidiaries were introduced. Pursuant to Art. 13a REG 2022/263 and Art. 8a REG 692/2014, PEB “shall undertake their best efforts to ensure that any legal person, entity or body established outside the Union that they own or control does not participate in activities that undermine the restrictive measures provided for in this Regulation.”+

In addition, export bans were extended by including further goods in Annex II of Regulation 692/2014.

## **10. What companies should do now**

In light of the expansion of personal sanctions, companies should ensure that they take the new listings into account in their sanction list screening. Furthermore, companies should review, based on their business activities and product range, whether and to what extent they or their products could be affected by the new prohibitions. Based on the results of this review, the Internal Compliance Program (ICP) may need to be updated.

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