

The 19th sanctions package against Russia



Trade
Compliance

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On October 23, 2025, the European Union (EU) adopted its 19th package of sanctions against Russia. The new package targets the energy and financial sectors in particular. At the same time, however, export and service bans were tightened and personal restrictions expanded.

1. Personal restrictions

Annex I to Regulation (EU) No. 269/2014 ("**Regulation** 269/2014") was expanded to include 64 natural and legal persons, organizations, and entities ("POE"). The new listings include companies based in China, Hong Kong, the United Kingdom, the United States, the United Arab Emirates, and Kyrgyzstan. A comprehensive supply ban applies to the listed PEOs.

2. Energy sector

The central element of the new package is an import ban on Russian liquefied natural gas (LNG) that will take effect on April 25, 2026. However, for imports based on contracts concluded before June 17, 2025, with a term of more than one year and which have not been amended since then, this ban will only apply from January 1, 2027.

In addition, the ban on transactions with listed ports and locks (Art. 5ae of Regulation (EU) No. 833/2014 ("**Regulation** 833/2014") has been extended to include ports and locks outside Russia. However, there are currently no entries in the relevant Annex XLVII Part C of Regulation 833/2014, meaning that the transaction ban on non-Russian ports and locks remains without practical application for the time being.

Furthermore, 117 entries have been added to the list of ships in the so-called "shadow fleet" (Annex XLII to Regulation 833/2014), bringing the total number of ships listed to 557. Extensive prohibitions apply to these ships in accordance with Article 3s of Regulation 833/2014.

3. Financial sector

Sanctions in the financial sector have also been extended. In particular, transaction bans have been expanded through new listings in Annexes XIV, XLV, and XLIV to Regulation 833/2014.

In addition to the System for the Transfer of Financial Messages (SPFS) of the Central Bank of Russia, from January 25, 2026, it will also be prohibited to connect to systems of the Central Bank of Russia or to systems with a message transfer function for payment transactions provided by another legal entity established or registered under Russian law, including the System for Fast Payments (SBP) and Mir.

Article 5b(2) of Regulation 833/2014, which prohibits the provision of certain services to Russian POEs, has been revised. The 19th package of sanctions now explicitly includes, in addition to crypto services, the issuance of payment instruments, the acceptance and settlement of payment transactions, payment initiation, and the issuance of e-money. In addition, a ban on participating directly or indirectly in transactions related to the crypto assets listed in Annex LIII has been newly introduced (Art. 5ba Regulation 833/2014).

4. Further changes

Annex IV to Regulation 833/2014, which lists POEs that are military end users or belong to Russia's military-industrial complex, has been supplemented by 45 entries.

Annex VII to Regulation 833/2014 has been expanded in Part A to include various items. In Part B, Table 3 (Photographic equipment, sensors, and optical components) has been revised, as have Table 6 (Energetic materials and precursors) and Table 8 (Chemicals, metals, alloys, composites, and other advanced materials). With regard to these "advanced technology" goods, export, transit, and ancillary service prohibitions apply in accordance with Art. 2a of Regulation 833/2014.

Annex XXIII, which lists goods that may not be sold, supplied, transferred, or exported directly or indirectly to POE in Russia or for use in Russia (Article 3k(1) of Regulation 833/2014), has also been amended again. In particular, all goods in HS Chapter 25 are now covered. In addition, further goods from HS chapters 40, 68, and 69 have been added.

The prohibition on services under Article 5n of Regulation 833/2014 has been completely revised and expanded. Services in other areas are now prohibited, namely in the field of artificial intelligence, high-performance computing, or quantum computing services, as well as services related to tourism activities.

5. Amendments to the Belarus Embargo Regulation (EC) No. 765/2006

In line with the EU's long-standing approach of aligning sanctions against Belarus with those against Russia, the amendments to Regulation 765/2006 as part of the 19th package of sanctions essentially correspond to the amendments to Regulation 833/2014.

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