

CLIENT ALERT

EU's 19th Sanctions Package Against Russia

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1. Introduction and Objectives

On October 23, 2025, the EU's 19th sanctions package was published in the Official Journal of the European Union. It targets trade of the EU with the Russian energy, financial and military sectors and widens the *de facto* jurisdictional reach of EU sanctions by listing further non-Russian entities in China and India, among others.

2. New Restrictive Measures

2.1 Energy Sector-related Restrictive Measures

- **Prohibition on the purchase, import or transfer into the EU of liquefied natural gas originating or exported from Russia, starting from January 2027** for long-term contracts, **and within six months** for short-term contracts.

- **Listing of 117 additional vessels** among those subject to a port access ban and a ban on the provision of a broad range of services related to maritime transport, bringing the total number of sanctioned vessels to 557.
- **Lifting remaining exemptions** on Russian oil companies **Rosneft** and **Gazprom Neft**, which are now on a full transaction ban.
- **Listing of oil traders, refineries and petrochemical companies** in third countries that breach sanctions, including in China.

2.2 Financial Sector-related Restrictive Measures

- **Full transaction ban on five additional Russian banks** and four **banks from Belarus and Kazakhstan**.
- **Restrictions on crypto platforms** and on the **provision of crypto services** to Russian nationals.
- **Prohibition on EU operators from connecting with the Russian National Payment Card System (Mir)** and the Bank of Russia's **Fast Payments System (SBP)**.
- **Ban on investments in nine Russian Special Economic Zones** linked to the war.

2.3 Export Control-related Restrictive Measures

- **Listing of 45 additional entities** (including in China, Hong Kong, India and Thailand) in Annex IV to the EU Russia Regulation, which includes persons, entities and bodies **subject to tighter export restrictions regarding dual-use goods and technology**, as well as **goods and technology which might contribute to the technological enhancement of Russia's defense and security sectors**.
- **Expansion of the list of export-controlled items** under Annex VII to the EU Russia Regulation to also include goods used by Russia in its war of aggression against Ukraine, such as **electronic components, rangefinders, additional chemicals and metals, oxides and alloys** used in the manufacturing of military systems.
- Introduction of **more stringent export restrictions on certain goods** which might contribute to the enhancement of Russian industrial capacities as listed in Annex XXIII to the EU Russia Regulation, such as **salts and ores, rubber products, tubes, tires, millstones and construction materials**, as well as the **prohibition on the purchase, import or transfer of all acyclic hydrocarbons**.

2.4 Services Sector-related Restrictive Measures

- Introduction of a **prior authorization requirement for all services** provided to the **Russian government**.
- **New restrictions** on the provision of **AI services, high-performance computing and quantum computing services** and **commercial space-based services** to Russian entities, including the Russian government. **For the provision of these services to their Russian subsidiaries, EU companies will require prior authorization.**
- Introduction of a new prohibition on the provision of **services directly related to tourism activities in Russia**.

3. Impact

The new restrictive measures materially expand the practical reach of the EU sanctions regime against Russia to non-Russian entities, including entities in China, Hong Kong, India and Thailand. Transactions with non-EU countries will thus require increased scrutiny and due diligence to mitigate risks of onward-sale and end-use in Russia. Furthermore, new export control-related restrictions, the broadened services ban and numerous additional financial sanctions listings will require additional examination by EU persons as well as non-EU persons involved in business dealings with an EU nexus.

Our Global Trade Compliance Team can assist companies trading with foreign countries in assessing the impact of new restrictions on their operations, obtaining authorizations to provide otherwise prohibited services and strengthening trade compliance programs to identify, manage and mitigate risks associated with EU sanctions.

If you have any questions regarding this client alert, please contact the following attorneys or the Willkie attorney with whom you regularly work.

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