



Sanctions in a Snap: Developments in Sanctions

EU Edition

Sanctions and Export Controls Update

Hughes Hubbard's "Sanctions in a Snap" is intended to provide a clear and concise summary of recent and important developments from the European Union (EU) and its member states. We hope you find it helpful in assessing EU economic sanctions and export controls risks against the current EU regulatory framework and enforcement priorities.

Highlights from November 2025 include new Russia-related designations under the Russia Human Rights sanctions program, the entry into force of the EU's amended dual-use list, the implementation by Malta of the EU directive on the criminalization of EU sanctions breaches, updated Syria- and Ukraine-related sanctions FAQs, a new EU enforcement initiative, and individual enforcement actions by member states including France, Germany and the Netherlands.

EU Regulatory Developments

New Russia-Related Designations

On 20 November 2025, the Council of the European Union designated 10 individuals, including officials of the penitentiary and judiciary services, responsible for serious violations of human rights in Russia under its Russia Human Rights Sanctions Program. As a result, these individuals are now subject to a travel ban and an asset freeze.

Update of the List of Dual-Use Items

On 15 November 2025, Delegated Regulation 2025/2003 of 8 September 2025 amending Annex I of the Dual-Use Regulation (Regulation 2021/821) entered into force. The changes are designed to align Annex I with decisions taken as part of multilateral export controls regimes in 2024, including the Wassenaar Arrangement, the Missile Technology Control Regime, the Australia Group and the Nuclear Suppliers Group. The amendments (i) modify certain control parameters and update certain technical definitions and descriptions and (ii) target additional items, including:

- Quantum technology
- Semiconductor manufacturing and testing equipment and materials
- Advanced computing integrated circuits and electronic assemblies
- Coatings for high-temperature applications
- Additive manufacturing machines and related materials
- Peptide synthesizers

These changes are directly applicable in all member states.

Malta's Implementation of the EU Sanctions Criminalization Directive

On 14 November 2025, Malta's Parliament implemented Directive 2024/1226 on the definition of criminal offenses and penalties for the violation of EU restrictive measures. As we explained in a previous client alert, the directive establishes a common framework for defining, investigating, prosecuting and sanctioning violations of economic sanctions. The deadline set for member states to implement the directive was 20 May 2025.

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Consistent with the requirements of the directive, Malta's National Interest (Enabling Powers) Act Revision makes most EU sanctions breaches a criminal offense punishable by fines of up to €5 million and imprisonment for up to 12 years for natural persons, and fines of up to 5% of the total worldwide turnover in the previous business year or €10 million for legal entities.

EU Guidance Updates

New FAQs on Ukraine-Related Sanctions

On 21 November 2025, the European Commission updated its FAQs on Ukraine-related sanctions on its dedicated webpage regarding:

- **Ban of State-Owned Enterprises (Article 5aa of Regulation 833/2014):** The commission clarified that the provision of insurance coverage for vessels calling into ports owned by an entity listed in Annex XIX is not prohibited under the state-owned enterprises ban as this provision of insurance is not a direct or indirect transaction with the listed entity.
- **Import Ban on Russian LNG (Article 3ra of Regulation 833/2014):** The commission clarified that the transfer of Russian liquefied natural gas (LNG) by EU operators is prohibited irrespective of the destination, including transfers both to EU member states and to third countries.

New FAQs on Remaining Syria Sanctions

In November 2025, the European Commission published new FAQs on the EU's Syria sanctions regime, summarizing remaining restrictions for operators. On 28 May 2025, the EU had lifted almost all sectoral sanctions on Syria targeting the banking, finance, energy and transport sectors and certain import and export restrictions following the fall of the Al-Assad regime in December 2024. Remaining EU sanctions include the following:

- The general arms embargo
- Export bans on (i) items that could be used for internal repression or (ii) telecommunications monitoring or interception, and (iii) Syrian cultural heritage items
- Travel bans and asset freezes against designated individuals and entities linked to the Al-Assad regime

EU Enforcement Highlights

Joint EU Enforcement Project Against Sanctions Evasion

On 20 November 2025, the European Anti-Fraud Office and Europol announced "Project Transporter," aimed to further reinforce the EU's response to sanctions circumvention. Project Transporter focuses on vehicle exports to third countries for possible onward transfer to Russia and Belarus. It will include information sharing and discussions between EU specialist investigators from customs, police and financial crime services to strengthen information exchanges, share investigative techniques and deepen operational coordination across Europe.

Select Member State Enforcement Actions

The following member states reportedly initiated additional enforcement actions over alleged breaches of EU sanctions:

- **Germany, 19 November:** Following investigations from German customs, three individuals are being tried by a court in Berlin over the alleged export of 257 luxury cars worth €28.2 million to Russia in breach of EU sanctions. The scheme involved intermediaries in Belarus, Kyrgyzstan, Kazakhstan and Turkey.
- **Netherlands, 24 November:** The first hearing in a sanctions and corruption case against Dutch shipbuilder Damen Shipyards, its president-commissioner, and former and current chief executives began in Zwolle. The corruption-related charges cover alleged corrupt payments to officials at Petrobras and the port authority on Curaçao, as well as undisclosed commission arrangements in Sierra Leone, Togo, Ghana, the Bahamas, Trinidad and Tobago, and Indonesia. The sanctions-related charges concern the use of incorrect export codes in 2022 by Damen to conceal the export of ship hulls to Russia in breach of EU sanctions.

Certain EU member states are also cooperating with U.S. enforcement actions. For example, on 3 November, France extradited a Belarusian citizen to the United States over alleged export to Russia of aircraft components sold by U.S. distributors using companies located in Armenia and the Maldives, in violation of the U.S. Export Administration Regulations.



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