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European Union Adopts 19th Sanctions Package Against Russia and Additional Belarus Sanctions Package

Client Advisories

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29 October 2025 – Following extensive discussions among EU member states and international partners, and as announced earlier this fall by both Kaja Kallas and Ursula von der Leyen, on 23 October the European Council adopted the much awaited 19th economic sanctions package against Russia for its continued war of aggression against Ukraine (19th Russia Sanctions Package). On the same day, the council also agreed on an additional sanctions package against Belarus for its involvement in and support of Russia's war (Belarus Sanctions Package).

EXECUTIVE SUMMARY

Key Takeaways from the 19th Russia Sanctions Package

- **Energy Sector Restrictions**
 - **Adoption of Import Ban on Russian LNG:** After significant debates, the EU adopted a new import ban on Russian liquefied natural gas (LNG) into the EU. The ban becomes effective from 25 April 2026, for short-term contracts and will apply to long-term contracts beginning in January 2027.
 - **Extension of List of Partner Countries for Importation of Petroleum Products:** As part of the ongoing efforts to reduce the EU's dependency on Russian petroleum products, the 19th Russia Sanctions Package extends the list of partner countries for importation of petroleum products to include Australia, Japan and New Zealand (current top partners include the United Kingdom, Norway and the United States).
- **Financial Sector Restrictions**
 - **Adoption of Measures Targeting Russian Crypto Assets and Currency:** targeting Russian crypto assets and a cryptocurrency called A7A5. The cryptocurrency is viewed as a prominent tool for financing activities supporting the war of aggression against Ukraine.
 - **Extension of Transaction Ban:**
 - The EU prohibited EU operators from engaging with two main Russian payment systems providers, the National Payment Card System (Mir) and the Fast Payments System (SBP).
 - Five Russian banks have been subject to the transaction ban starting from 12 November. Additionally, nine financial entities from third countries — including Kazakhstan, Tajikistan and Kyrgyzstan — are also now

subject to restrictions.

- **Restrictions on Dealings With Russia's Special Economic Zones (SEZs):** The SEZs located in the Far Eastern and Arctic areas are viewed as central to Russia's industrial and technological capacity, and as contributing both to the Russian war effort and to the circumvention of sanctions. The new measures include a prohibition on acquiring interests in or creating new joint ventures (JVs) with entities registered or established in the SEZs, as well as a prohibition to grant any loan or credit to entities in the SEZs.
- **Services Restrictions**
 - **Restrictions Relating to the Provision of Services:** New restrictions targeting the provision of AI services, high-performance computing services and commercial space-based services to Russian entities.
 - **Prior Mandatory Authorization for All Services Provided to the Russian Government:** To grant an authorization, national competent authorities (NCAs) should ensure that the authorizations are consistent with the objectives of the EU's Russia sanctions.
- **Diplomatic Measures**
 - **Adoption of Reporting Obligations for Russian Diplomats Traveling in the Schengen Area:** Russian diplomats are now required to inform the relevant EU member state(s) in advance of their travels.
- **New Designation Criteria**
 - **Protection of Ukrainian Minors Through Adoption of New Designation Criterion:** Persons responsible for the abduction, forced assimilation and militarized education of Ukrainian minors will now be sanctionable under Regulation 269/2014.

Key Takeaways from the Belarus Sanctions Package

- **Financial Sector Restrictions**
 - **Adoption of Measures Targeting Belarus Crypto-Related Payment Services:** Issuing payment services and electronic money to Belarusian nationals. Payment service providers and crypto-assets service providers are responsible for ensuring compliance with the new EU restrictions.
- **Services Restrictions**
 - **Restrictions Relating to the Provision of Certain Services:** New restrictions target the provision of AI services, high-performance computing services and commercial space-based services to Belarusian entities.
 - **Adoption of Prior Mandatory Authorization:** Such authorization is required for all services provided to the Belarusian government or its public entities.

[Read the full detailed overview of the EU's 19th sanctions package against Russia and additional Belarus sanctions package.](#)

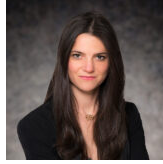
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Hughes Hubbard's Paris-based EU Economic Sanctions and Export Controls team, part of the firm's Sanctions, Export Controls & Anti-Money Laundering practice, is well positioned to assist EU operators in navigating, in a practical and pragmatic way, EU sanctions against Russia and other EU thematic or country-based sanctions programs. Please contact us if you have any questions about the above or any prior topics of our client alerts.

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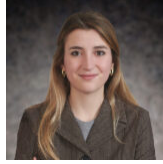
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