

Europe increases pressure: 19th package of sanctions targets Russian energy and financial sectors

The Member States of the European Union (EU) have agreed to further strengthen restrictive measures against the aggressor state, Russia, and its supporter, Belarus, by adopting the 19th package of sanctions on 23 October 2025. The new round will have a significant impact on Russia's energy sector by imposing a ban on the import of liquefied natural gas, on the financial sector by restricting the issuance of payment instruments, and on the shadow fleet by adding 116 new vessels to the sanctions list.

Key elements of the 19th sanctions package

Expanded list of goods and technologies subject to export ban, including items that may be used to develop Russia's military capabilities

Goods that, due to their physical and chemical properties, may be used to develop Russia's military and defence capabilities, as well as used in the armed conflict in Ukraine, include, for example, military rangefinders or various chemical alloys and metals used in the production of electronic devices, which are prohibited from export to Russia.

Ban on the import of liquefied natural gas (LNG)

The new package of sanctions imposes a ban on the purchase, import or transit of liquefied natural gas originating in Russia (or exported from Russia), with effect from 1 January 2027.

Stricter restrictions on payment services

Similar to the *SPFS* system created by the Central Bank of Russia as a response to Russia's exclusion from the *SWIFT* network, the 19th sanctions package imposes transaction bans with certain entities using *Mir* (Russia's national payment card system) and *SBP* (Fast Payment System), established by the Central Bank of Russia or another legal entity registered in Russia.

Measures restricting crypto-asset transactions

Being aware of the risks arising from the use of crypto-assets to circumvent sanctions and finance military operations, EU Member States have decided to expand the prohibition list of third country financial institutions which provide crypto-asset services.

Prohibition on the issuance of payment instruments

Under the new sanctions package, the issuance of payment instruments is prohibited to Russian nationals or natural persons residing in Russia, or to any legal person, entity or body established in Russia.

Prohibition on the involvement in certain Special Economic Zones (SEZs)

Recognising the potential risks arising from attracting new companies to Russian special economic zones (SEZs) that could contribute to the enhancement of Russia's military capabilities, the new sanctions prohibit any participation in the ownership structures of companies located in certain Russian SEZs, *inter alia* including the establishment of joint ventures and the conclusion of any type of contract with such companies.

Ban on provision of services in artificial intelligence, quantum computing, and commercial space activities

Taking into consideration the rapid technological development, particularly in information technology, new restrictions have been established regarding the provision of services to persons registered in Russia in the following sectors: artificial intelligence, commercial space services, and quantum computing. Providing that such services could be used in Russia's interest to develop skills and technological solutions related to geological exploration and precision mapping.

Russia as an unwanted tourism destination

To reduce non-essential travel by EU citizens to Russia, the provision of tourism services to persons intending to visit Russia for tourism purposes is restricted. Considering that EU Member States are deemed undesirable in Russia, their citizens face risks to possible personal freedom restrictions under Russian jurisdiction. In such cases, EU Member States have limited diplomatic and consular capacities to secure the release and return of their citizens to EU territory.

Authorisation requirement for the provision of non-prohibited services

For the provision of services that are not prohibited under the EU law to the Russian authorities a person must obtain prior authorisation from the competent authority of the Member State.

Prohibition on reinsurance of Russian aircraft and ships

To limit financial benefit from the sale of old, unmaintained, and unused aircraft and ships owned by Russia, it is prohibited to reinsure such assets for five years from the date of sale.

Extension of the period for transactions to close companies in Russia owned by EU citizens

Legal and natural persons of EU Member States with registered companies in Russia are granted an extension until 31 December 2026 to carry out transactions related to the divestment or liquidation of these Russian-based companies. EU Member States reiterate that Russia is a jurisdiction where the rule of law cannot be guaranteed; thus, reactions by Russian authorities are unpredictable, and decisions affecting companies owned by persons from “undesirable countries,” including EU Member States, may pose risks such as asset freezing or other adverse actions. EU citizens contemplating the establishment of companies or joint ventures in Russia are urged to carefully assess all potential risks.

Stricter mobility restrictions for Russian diplomats

A prior requirement of notice is introduced for Russian diplomats and consular officials entering the Schengen Area and Member States where they are not accredited. Member States will have the right to deny entry to Russian diplomats based on travel documents issued by another state.

Updated list of partner countries for oil imports

The list of partner countries from which oil imports do not require proof of origin has been updated in accordance with Article 3 of Regulation (EU) No 833/2014 and its Annex LI, including Australia, Japan, and New Zealand, to enhance cooperation and energy security in Europe.

The EU sanctions lists have been supplemented with:

- 45 legal entities supporting Russia's defence and security sector, including legal entities established in third countries;
- 8 credit institutions, with which it is prohibited to engage in any transactions;
- 116 "shadow fleet" ships or vessels;
- 4 banks located outside Russia that use the Russian Central Bank's *SPFS*, developed by the Russian Central Bank;

- 6 financial institutions providing crypto-asset services;
- 11 special economic zones (SEZs) where it is not permitted to be a participant, establish a new joint venture, entity, or structure, or conclude contracts for the purchase of goods or services with a legal entity registered in any of the listed SEZs;
- 1 crypto-asset.

New definitions introduced for the terms “Owning” and “Controlling”

The targeted sanctions introduce, for the first time within the EU’s restrictive measures framework, legally binding definitions of the terms “owning” and “controlling”, thus enhancing legal certainty and ensuring uniform application across all Member States. Previously, these concepts were interpreted and applied through guidance documents issued by the EU institutions. Their inclusion in the Regulation 269/2014 now make them legally binding, while maintaining consistency with the interpretations already provided in existing EU guidance — therefore, the practical application of these terms remains unchanged.

New definitions in Article 1 of Regulation (EU) No 833/2014

- “crypto-asset”
- “payment services”

In Article 2 of Regulation (EU) No 269/2014 the reference to “associated bodies” has been removed.

Annex I of Regulation (EU) 269/2014 may further include persons involved in crimes against Ukrainian children, including deportation, forced displacement, their assimilation in Russia’s interests, and other acts.

Impact of the 19th sanctions package on Belarus

In order to avoid the risk of sanctions being circumvented via Belarus, a large part of the new restrictions also applies to Belarus. Additional restrictions have been imposed on the provision of computer software development, installation, and maintenance services.

A more detailed summary of the 19th sanctions package is available in the attachment.

More information on the new round of sanctions (in English) is available in the [Official Journal of the EU](#).

Since April 2024, the FIU has been the national competent authority for sanctions enforcement in Latvia.