The Changing Face of the Enforcement of EU Sanctions in 2026

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YEAR OF ENFORCEMENT?

When?

UK Signals a ‘Year of Enforcement’ on Sanctions

“2024 has to be the year of enforcement, because if it’s not, then I think the credibility of UK sanctions starts to be brought into question.”

2026 Is the **Year of Enforcement**

2023 – year of enforcement?

Back in November, we said 2025 would be the year of enforcement

OFSI had previously declared 2024 a '**year of enforcement**,'

it finally feels like **2026** is the **year of enforcement**

UK Signals a ‘Year of Enforcement’ on Sanctions

2024 must be the **year of enforcement**

Europe failing?

Is that right? Is that fair?



CARNEGIE EUROPE

COMMENTARY STRATEGIC EUROPE

Europe Needs its own Sanctions-Enforcement Muscle

The EU can impose sanctions but struggles to enforce them without the United States. With Washington increasingly disinterested in backing European interests, the bloc must now fend for itself.

By Nicu Popescu and Tiago Antunes
Published on Oct 22, 2026

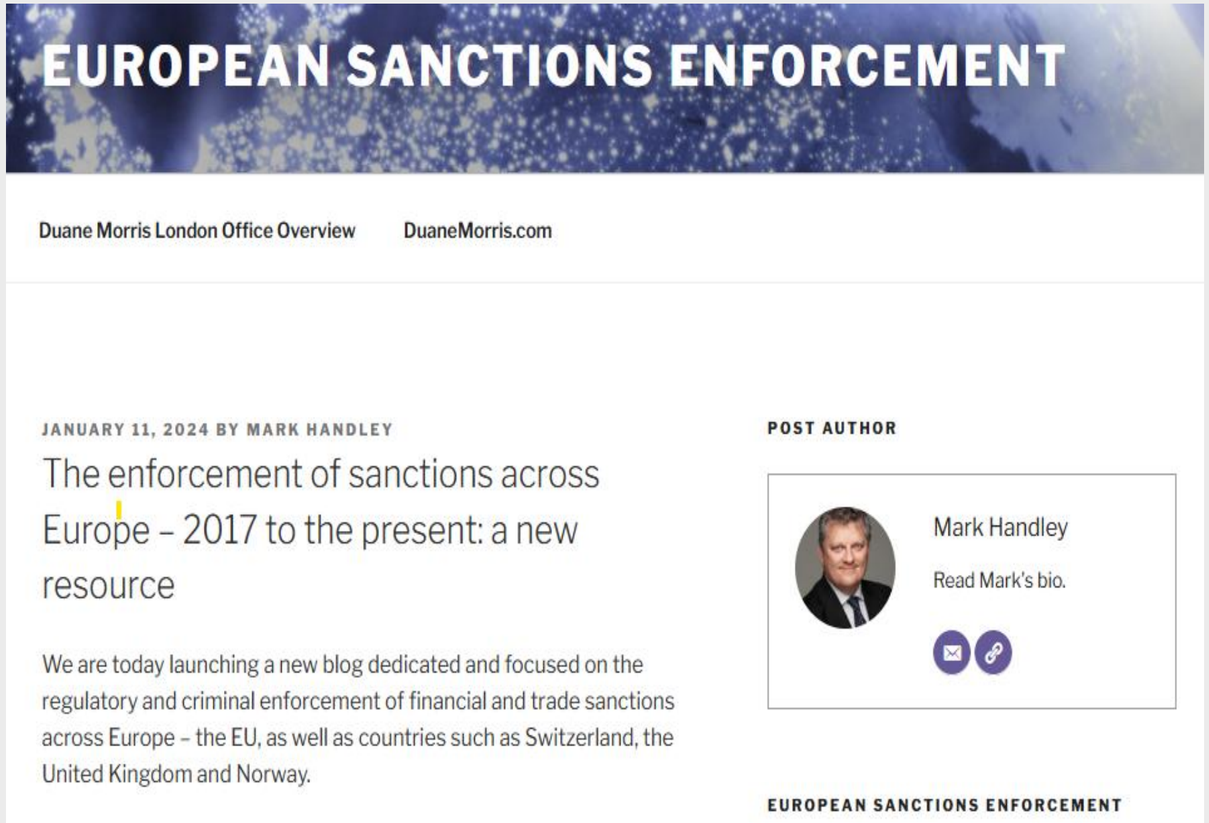
It is time for Europeans to get more serious about enforcing their own sanctions regimes.

The Data

All taken from:
https://blogs.duanemorris.com/europeansanctionsenforcement/

Enforcement actions (arrests, charges, convictions) *in the public domain*:

- **Covers 2017 to the present**
- **Covers all of Europe – the EU but also Norway, Iceland, Switzerland and the UK**
- **All sanctions regimes covered, but the vast majority relate to Russian sanctions**



Constant activity

Rosjanka i pięciu Polaków dostarczali Rosji komponenty do produkcji broni. ABW rozbiła siatkę szpiegów

Piotr Halicki · Obserwuj

5 listopada 2026, 09:00

Five charged in France over alleged Hamas founding

La caccia al cinghiale in Crimea organizzata da un italiano che «se ne frega» delle sanzioni

Belgium & Myanmar: Monde Selection faces sanctions investigation over awards given to military-owned beer companies

Russian National Arrested and Extradited to New York on Charges of Evading Sanctions on Russia

Wermelskirchener Firma soll gegen Sanktionen verstoßen haben

Von Wolfgang Weitzdörfer

05.11.2026 · 07:00 Uhr

Maksu- ja Tolliamet tegi idapiiril miljon tollikontrolli ja avastas üle 8000 rikkumise

Důlní stroje mířily do Ruska: Stíhání firmy Ferrit končí po složení 26 milionů

08. 10. 2026 JUSTICE

Romanian company accused of selling machine tools to Belarus

02.10.2026, 11:54

The French Navy detained a sanctioned tanker from russia's shadow fleet

Kyiv • UNN • October 13 2026, 02:56 AM • 212 views

Two Belarusians fined 419 thousand euros in Lithuania

2.10.2026 / 12:19

Nashaniva.com

Belarusian couple fined 17,500 euros out of nowhere at the French-Swiss border

17.10.2026 / 09:02 Бел Łac Рус

Nashaniva.com

Indictment for illegal production and trafficking of military unmanned aerial vehicles

02.11.2026

Möglicher Sanktionsverstoß

Bericht: Ermittlungen gegen Russisches Haus in Berlin

05.10.2026, 08:48 Uhr

Missing Data

Most member states do not publish enforcement data or publicize enforcement actions.

How many Russians has ANAF sanctioned and confiscated since the beginning of the full-scale war in Ukraine

Oct 27, 2024
Alex Costache

SHARE:

Poland has imposed penalties for circumventing anti-Russian sanctions

Magdalena Graniszewska @MGraniszewska m.graniszewska@pb.pl published: 2024-06-27 20:00

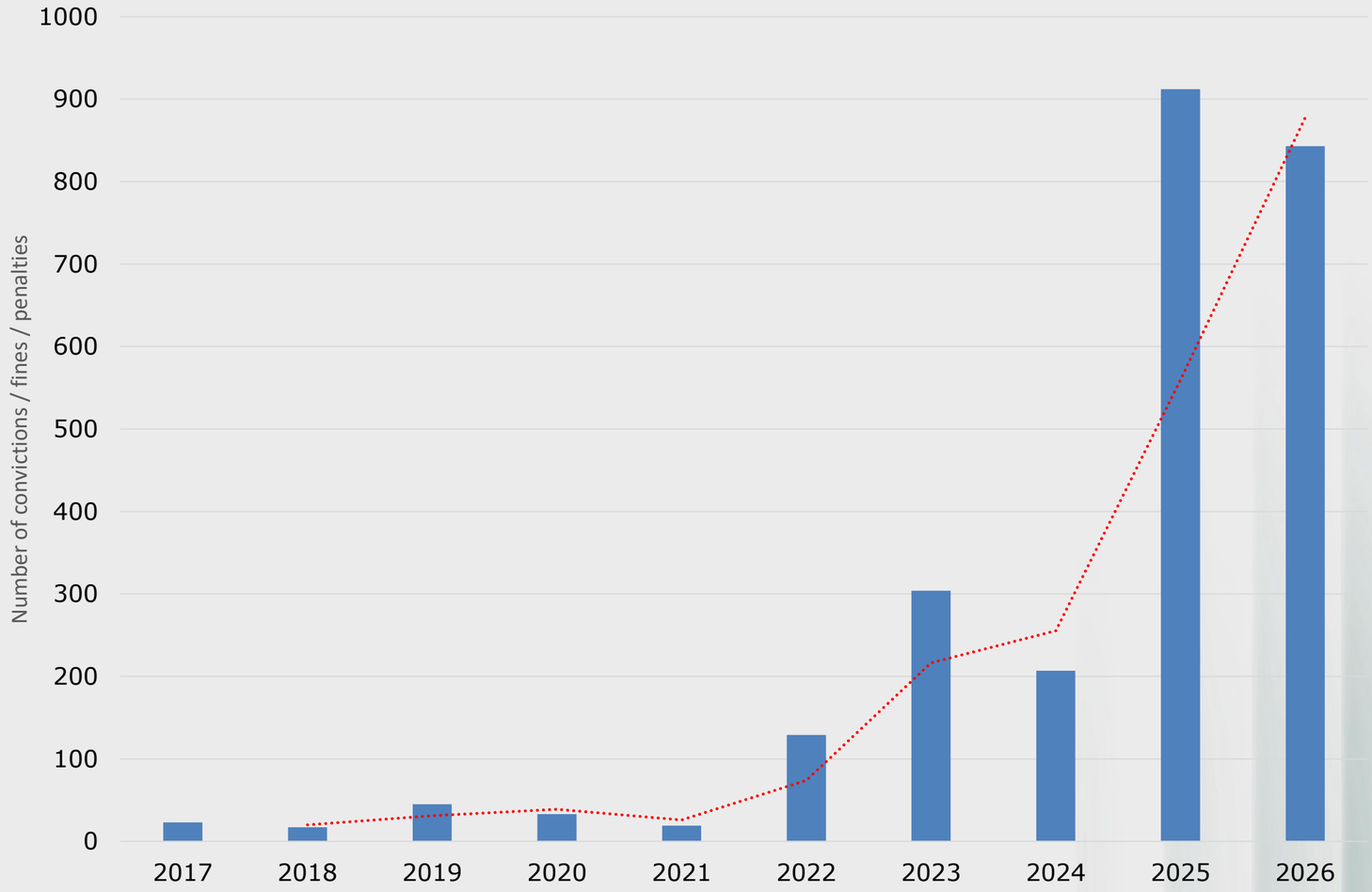
JULY 22, 2024 BY MARK HANDLEY

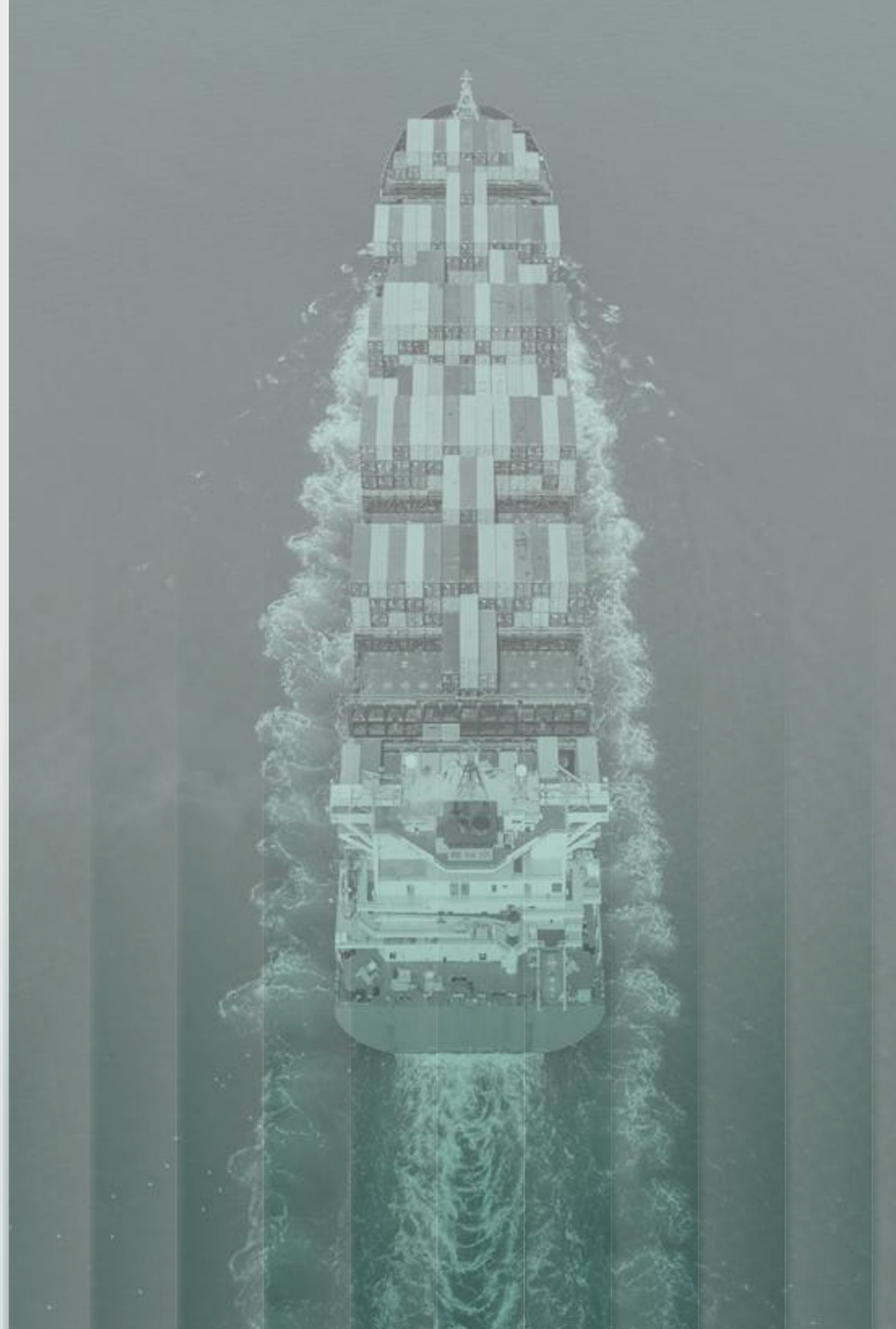
Germany – sanctions enforcement statistics: at least 1988 investigations since February 2022

The German media outlet Südwestrundfunk has conducted a survey of Germany's state justice ministries, public prosecutors office and the Federal Prosecutor's Office to compile statistics on recent sanctions investigations in Germany.



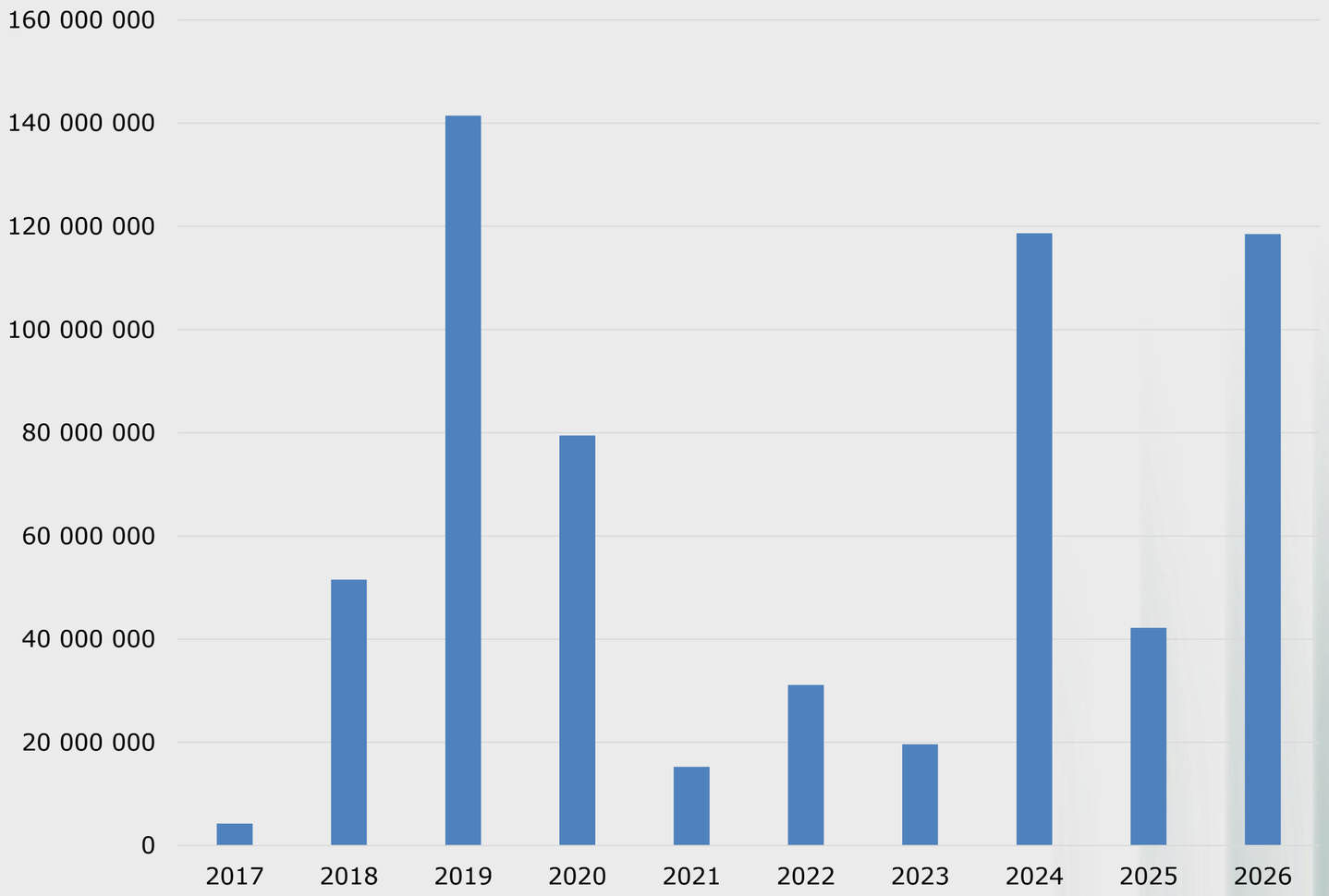
Successfully-concluded enforcement actions 2017-2026

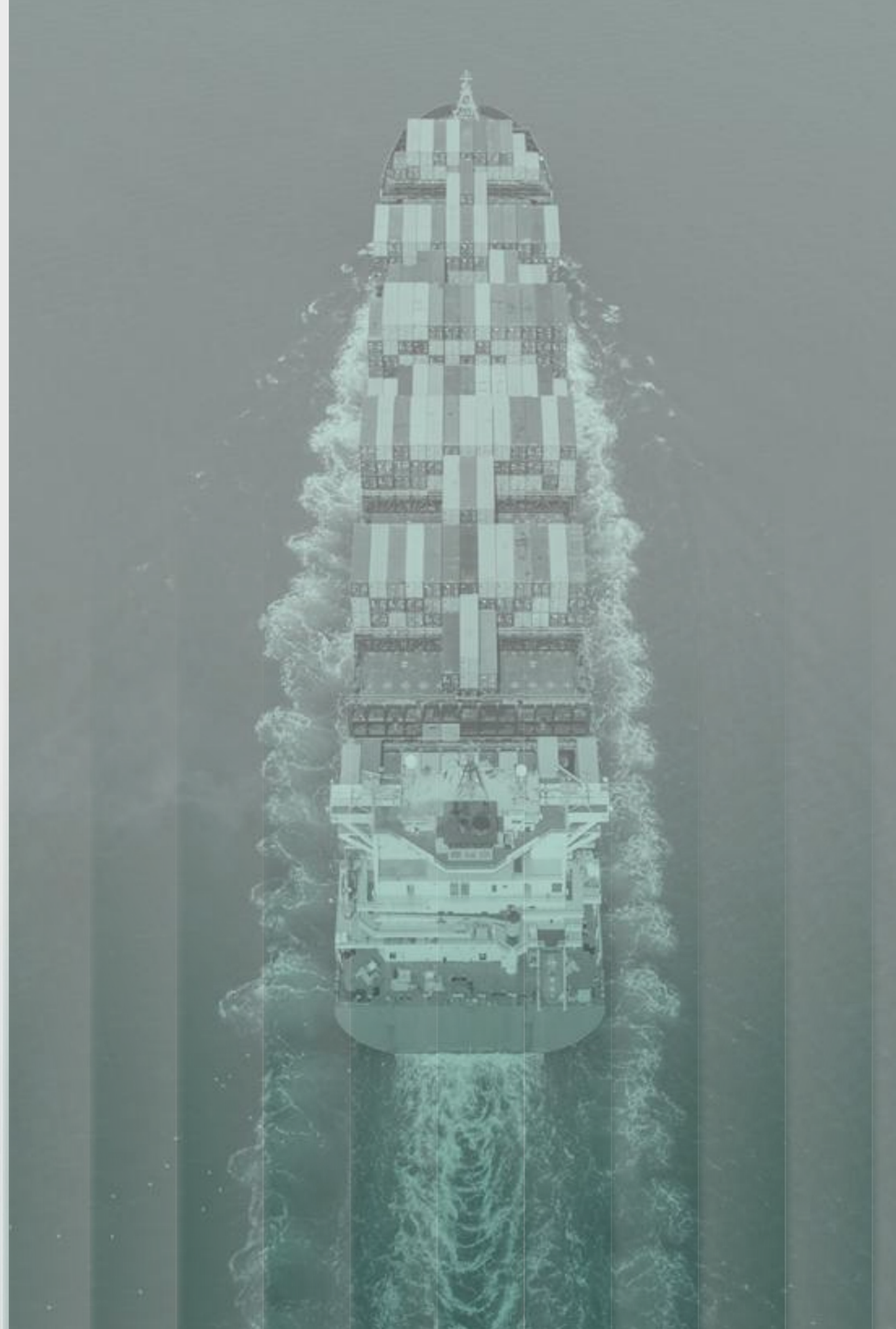




€622 million in fines 2017-2026

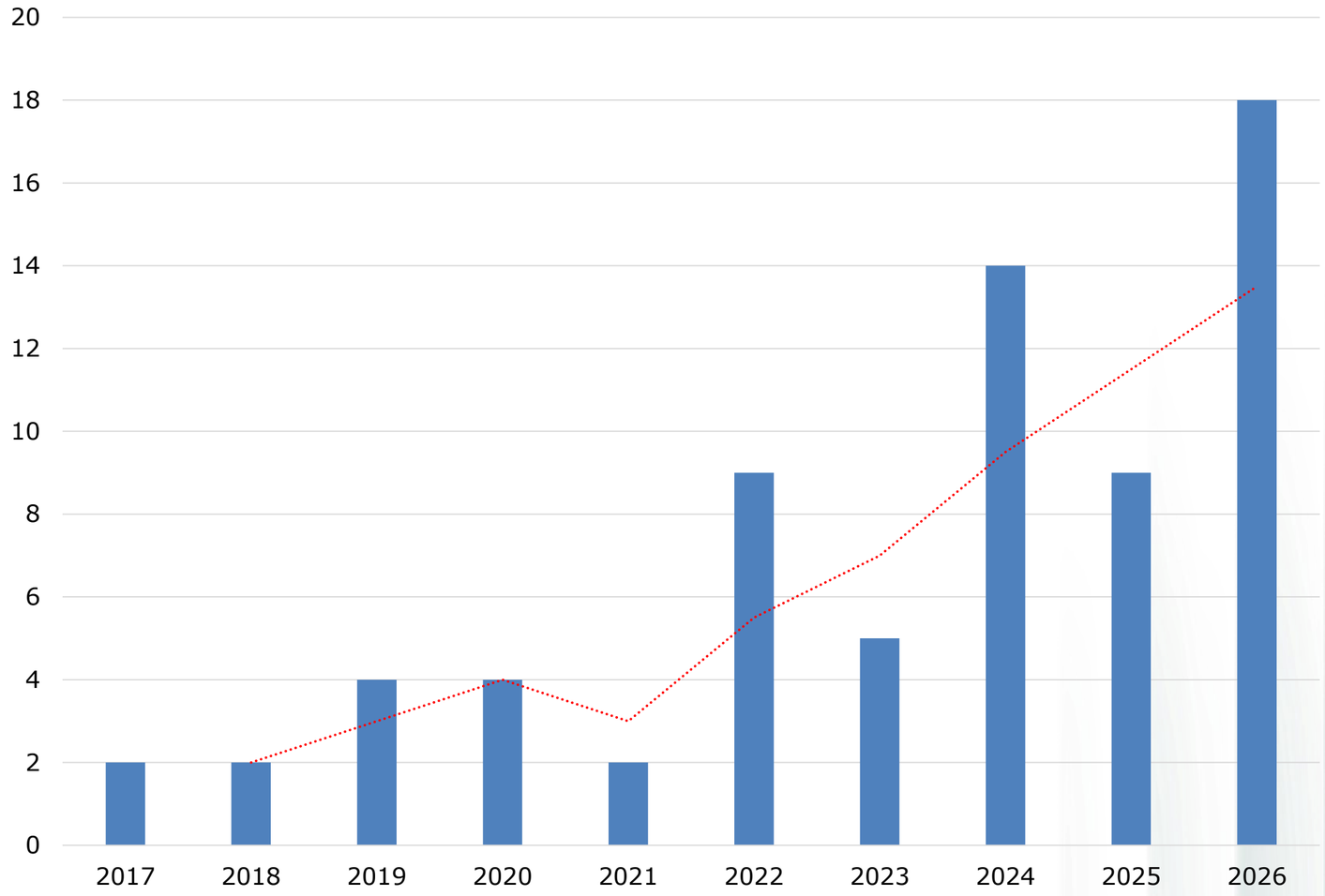
2026 on track to be highest on record





More larger fines

Number of fines over €1 million

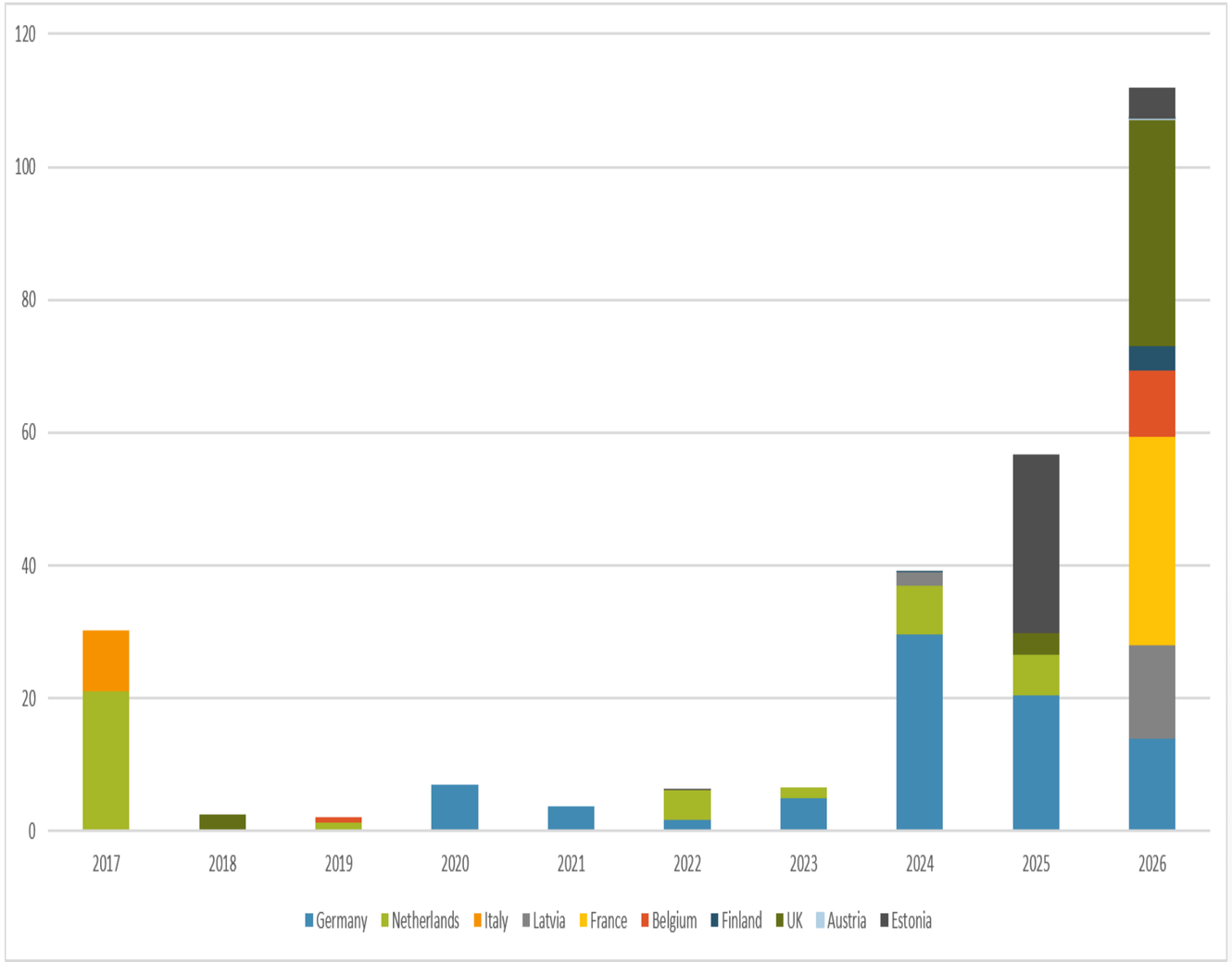


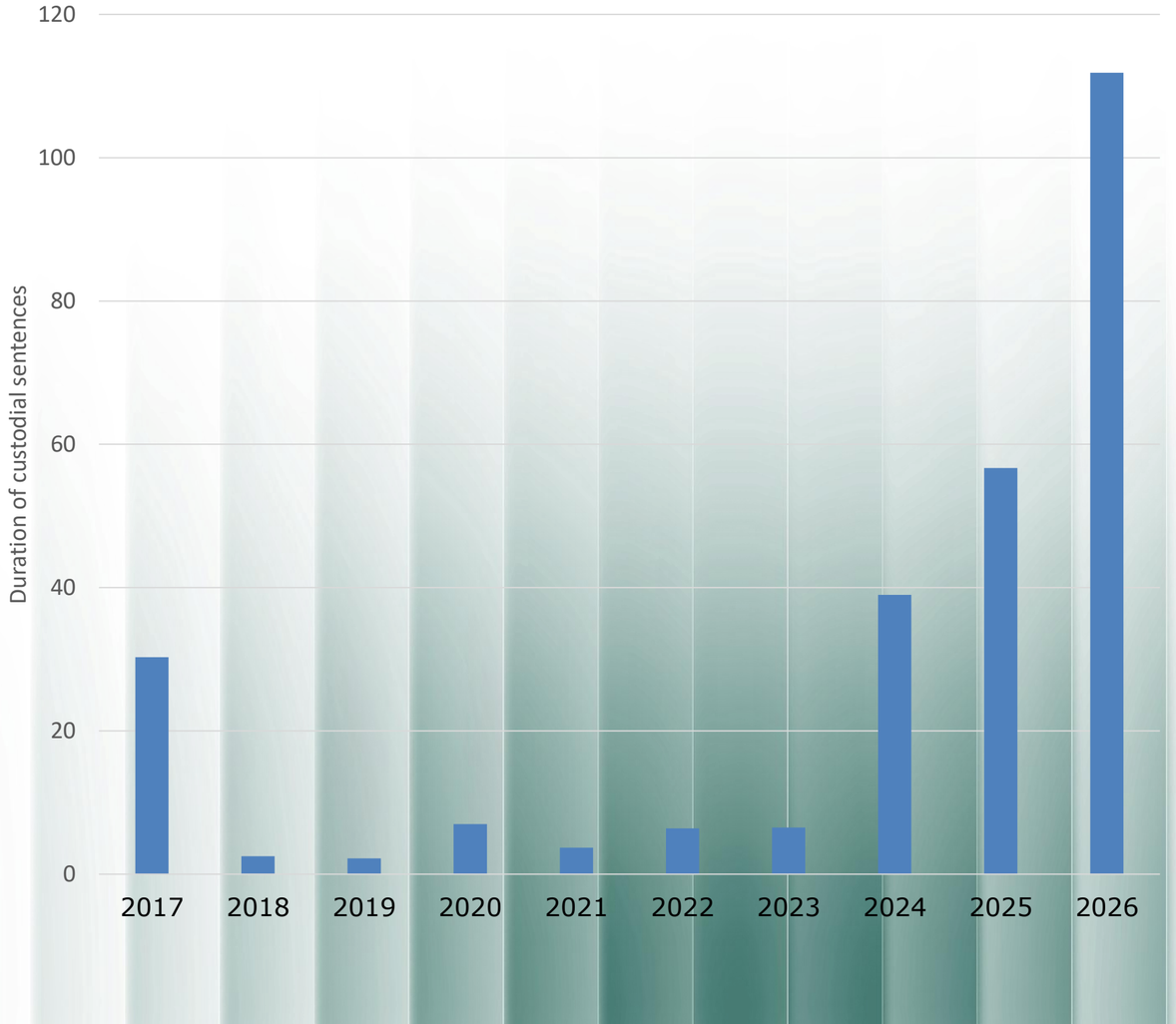


Investigations since 2022

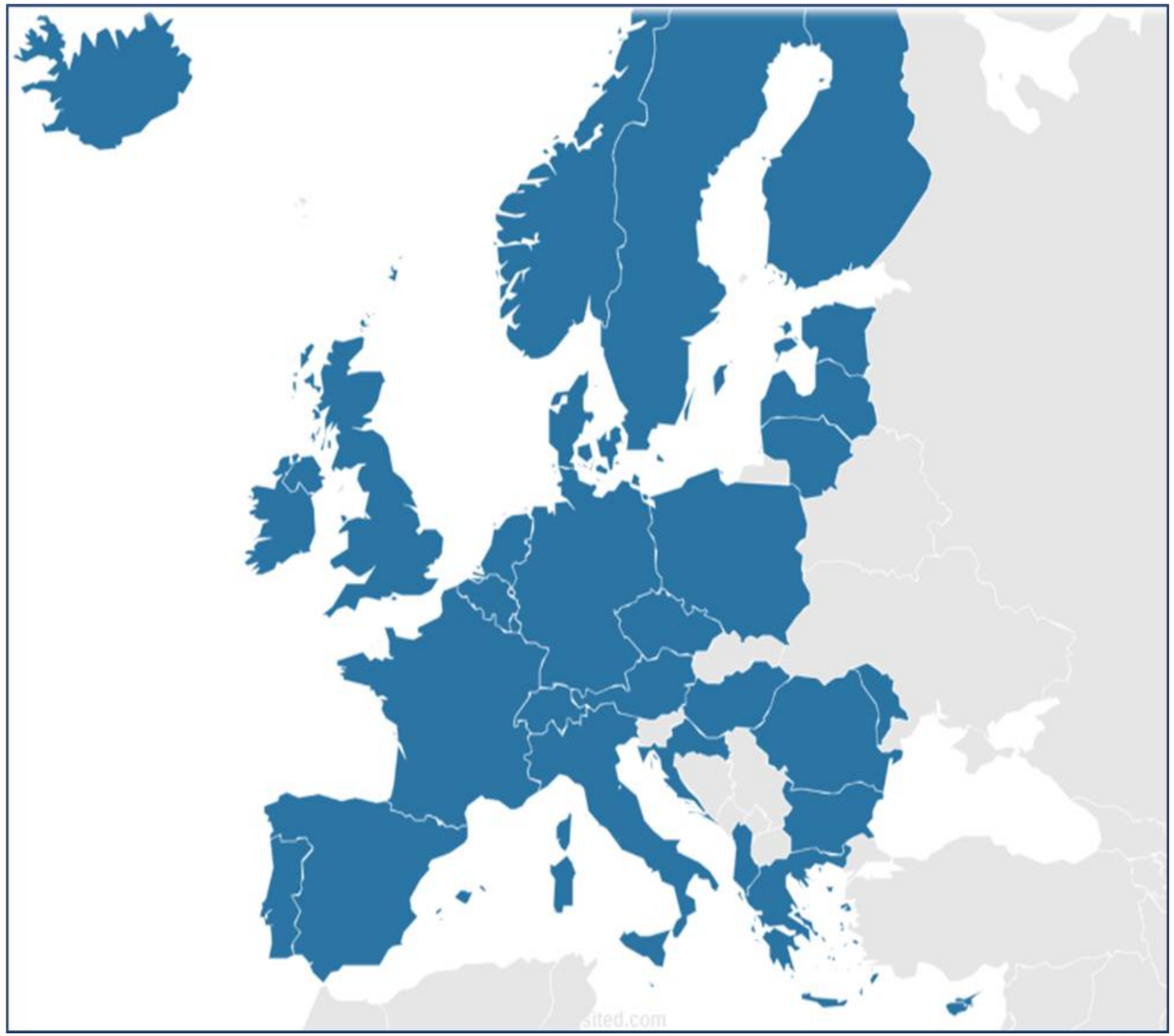
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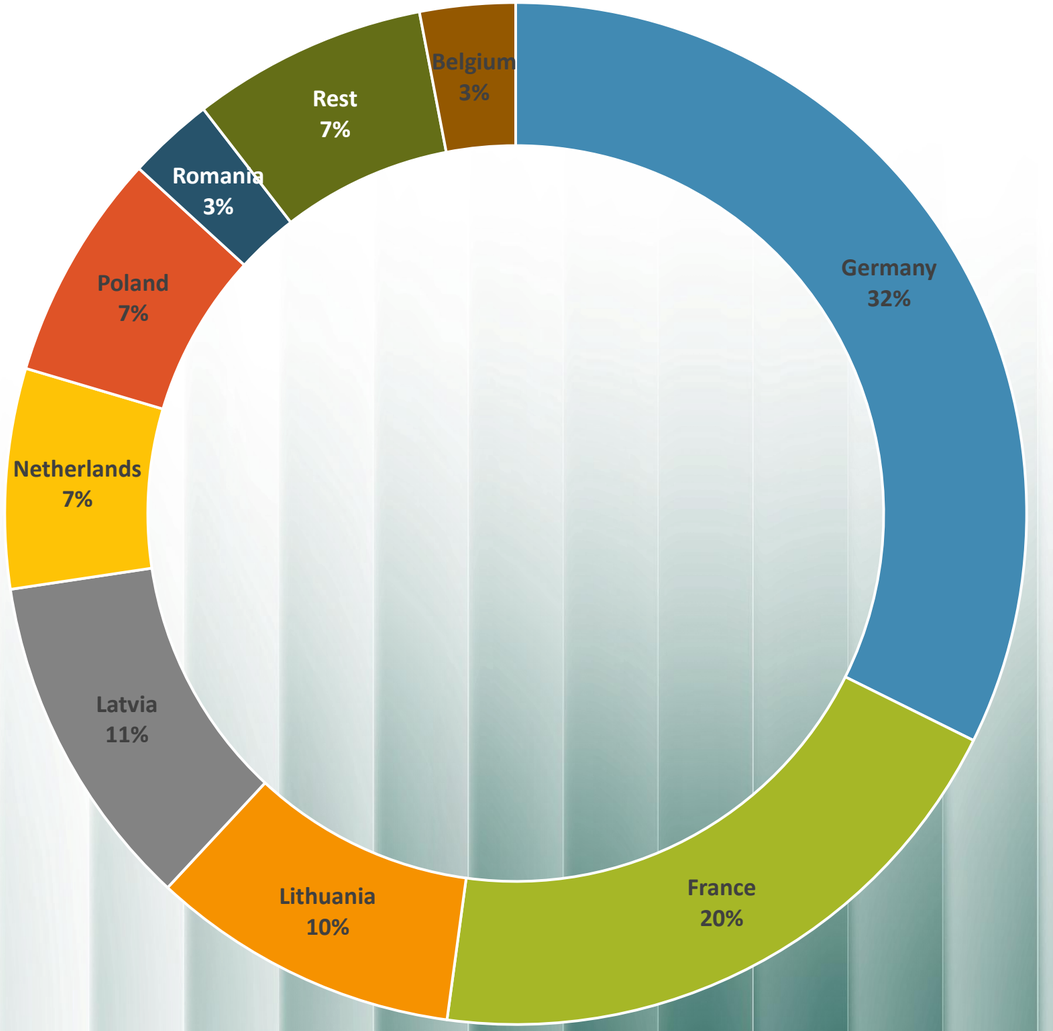
Jail sentences: 207 years since 2024





Uneven geographic spread?





Latvian enforcement

2026 – key data

- Latvian Customs
  - €15m in goods confiscated at the border.
  - Since June 2025, 318 on-the-spot administrative penalties with total fines of €3,467,625.
  - First half of 2026, 18 criminal and 29 administrative proceedings commenced.
- Two companies convicted and fined for electronics exports. One of the companies liquidated.
- Starlink exporter to Russia jailed for 11 years.
- Conviction of company and individual who imported timber from Russia.
- Exporter of ammunition jailed for 3 years.
- Prosecutions ongoing for IT services and re Moscow House.



THANK YOU!

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https://blogs.duanemorris.com/europeansanctionsenforcement/