



# Questions and answers on the sixteenth package of restrictive measures against Russia

Brussels, 24 February 2025

## **LISTINGS**

### **Who have you targeted?**

The 16th package of EU sanctions adds 48 individuals and 35 entities to the list of individuals and entities subject to an asset freeze and a prohibition on making funds and economic resources available to them. The new listings touch upon various sectors of the Russian state, including the Russian military-industrial complex. In particular, the new listings contain individuals and entities supporting Russia's military complex, active in sanctions circumvention, Russian crypto assets exchanges and in the maritime sector. The latter set of listings aims to add additional pressure on Russia's shadow fleet.

The 16th package also adds two new criteria for the listing of individuals and entities, targeting respectively those who supported the operations of unsafe oil tanker (see further details below), and those that are part of Russia's military and industrial complex or support it, or benefit from it.

## **ANTI-CIRCUMVENTION MEASURES**

### **LISTING OF VESSELS**

#### **Why are vessels listed?**

EU sanctions enable the EU to list vessels that support Russia's warfare against Ukraine. Such vessels can be listed on the basis of criteria such as the transport of military equipment, the transport of stolen Ukrainian goods such as grain, their participation in the shadow fleet transporting Russian oil under high-risk shipping practices and their support to the exploitation or development of the Russian energy sector.

#### **Which vessels are affected and what is the scope of the measures against vessels?**

In the 16<sup>th</sup> package, the EU has listed 74 vessels that form part of the shadow fleet or contribute to Russia's energy revenues. Vessels subject to today's measures are listed in Annex XLII to Regulation 833/2014.

A vessel listed in Annex XLII is subject to a port access ban, and a prohibition to provide a broad array of maritime services, and other services such as financing and financial assistance, including insurance and brokering, flag registration, technical assistance, bunkering, ship supply services, crew changes services, cargo loading and discharge services, fendering, and tug services.

This means that such services cannot be provided by EU operators, in ports or outside of territorial waters. It is also prohibited to charter, operate or crew such a vessel, as well as to engage in ship-to-ship transfers or any other transfer of cargo with, or procure any services from, such a vessel. The full list of prohibited services is set out in Article 3s of Council Regulation 833/2014.

#### **Why did you add a new listing criterion targeting those who supported the operations of unsafe oil tankers?**

The Commission, with the support of the European Maritime Safety Agency (EMSA), is working in close cooperation with the Member States to tackle the maritime safety and environmental dangers posed by the shadow fleet. The 16<sup>th</sup> package adds a new listing criterion, targeting those who support the operations of unsafe oil tankers. This is a strong response to the use of the shadow fleet, as it targets the network behind the too often unsafe oil tankers that now widely support Russian oil exports. This will help addressing circumvention of the Oil Price Cap, and environmental risks linked to the shadow fleet.

## **Why did you extend due diligence requirements to specific items?**

The measures extend the due diligence requirements for EU operators to two particular items which are found in Iranian and Chinese drones used by Russia and already under export prohibitions. EU companies have to perform due diligence to prevent these goods from reaching Russia, and to ensure that their foreign subsidiaries do the same.

## **ENERGY MEASURES**

### **What does the temporary storage measure entail?**

The 16<sup>th</sup> package introduces a prohibition on the provision of temporary storage and placement under free zone procedure for Russian crude oil and petroleum products within the EU, irrespective of the purchase price of the oil and of the final destination of those products. Such a prohibition will inflict additional costs on the transport of Russian oil thereby reducing Russian revenues.

### **What does the goods, technology and services ban for oil projects in Russia entail?**

It is already prohibited to provide goods, technology and services for the completion of Russian LNG projects. The 16<sup>th</sup> package extends that prohibition to the completion of crude oil projects such as exploration and production projects in Russia, such as the Vostok oil project. This will impact the ability of Russia to expand its crude oil production capacity and reduce its revenues.

### **Why did you extend the export ban to software for oil and gas exploration?**

The 16<sup>th</sup> package prohibits the sale, supply, transfer, export or provision of software used in oil and gas exploration to Russia, including software used in drilling processes, geological inspections and reservoir calculation. This measure aims to restrict Russia's ability to maintain and expand its oil and gas production capacities, which rely on these kinds of advanced software. Limiting this technological support reduces Russia's ability to generate revenue from these resources.

## **TRADE MEASURES**

### **How is the direct import ban on Russian aluminium is going to work in practice?**

In addition to the prohibition already in place for importing of processed aluminum goods from Russia, this package adds a ban on EU imports from Russia of primary aluminium. This measure will be gradually phased in. In particular, during a transitional period economic operators will be able to import aluminium, subject to an overall volume limit (quota) corresponding to less than one year of imports from Russia. This quota mechanism will allow 275,000 tons, which equates to 80% of EU imports in 2024, to be used over a 12-month period. By the end of 2026, no Russian aluminium can be imported into the EU.

EU imports of this commodity have already been decreasing significantly. In fact, the EU's dependence on Russian aluminium decreased from 16% in 2020 to 6% in 2024. Alternatives are readily available from over 15 countries across various regions - including Europe, on similar terms to that sourced from Russia.

### **How do you tighten further dual-use export restrictions and why?**

We are expanding dual-use export restrictions on the basis of information from the ground – both from the battlefield in Ukraine, e.g. identifying additional products and technologies that the Russian army is using, and also from reports of Member States national competent authorities on implementation and enforcement, as well as analysis of open-source information and information shared by partners.

Based on this feedback, we are tightening the already limited exemptions and derogations to prevent their misuse. In addition, we are including **5 additional categories of sensitive items** in the list of advanced technologies that are subject to export restrictions:

- **Dual-use chemical precursors** to produce chloropicrin and other riot control agents used as chemical weapons by Russia in violation of the Chemical Weapons Convention.

- **Software related to Computer Numerical Control (CNC) machine tools used to manufacture weapons**, and **video-game controllers** used by the Russian army to pilot drones on the battlefield.
- **Chromium ores and compounds** due to their military applications.

We are also adding 53 new entities to the list of those that have been identified as supporting the Russian military-industrial complex or engaged in sanctions circumvention, which includes 19 entities established in Russia and 34 entities established in third countries: 25 China, including Hong Kong, 2 India, 2 Kazakhstan, 2 UAE, 1 Uzbekistan, 1 Türkiye and 1 Singapore.

### **What additional export restrictions have been introduced?**

Additional export bans have been introduced on industrial goods, specifically targeting minerals, chemicals, steel, glass materials, and fireworks, that are of military significance.

## **TRANSPORT MEASURES**

### **Why did you ban listed third country airlines operating domestic flights in Russia?**

The 16<sup>th</sup> package introduces a possibility to list third-country airlines operating domestic flights in Russia or supplying aviation goods to Russian airlines or for domestic flight in Russia. This measure is aimed at targeting those operators that help Russia mitigate the impact of EU aviation sanctions. If listed, these airlines would face a ban on flying to the EU. There would be no consequences for third-country airlines merely flying over Russia.

### **Why was the road transport prohibition tightened?**

Increasing evidence shows that the current road transport prohibition is at risk of being circumvented through purchase by Russian persons of EU road transport undertakings. The 16<sup>th</sup> package therefore introduces an amendment that prevents increasing Russian ownership above 25% in EU road transport undertakings, thereby closing potential loopholes for circumventing existing sanctions.

## **INFRASTRUCTURE MEASURES**

### **Why did you introduce a full transaction ban on specific Russian ports and airports?**

Certain Russian ports and airports are used to transport drones and other combat-related goods and technology or to circumvent the Oil Price Cap by transporting Russian crude oil with vessels of the shadow fleet, thus directly contributing to Russia's military efforts, or providing revenue to fund its war. Hence the imperative need to include a full transaction ban on those Russian ports and airports. This includes two Moscow airports (Vnukovo Airport and Zhukovsky Airport) and four regional airports, and the Volga port Astrakhan and Makhachkala port on the Caspian Sea. The sea ports Ust-Luga and Primorsk on the Baltic Sea, and Novorossiysk on the Black Sea were also included as they are used to transport Russian crude oil by using the shadow fleet and other irregular and high-risk shipping practices. Today's measures include exemptions to ensure that essential legal trade flows and individual travel would not be disrupted.

### **What does the ban on construction services provided by EU operators in Russia entail?**

Today's measures ban, in particular, civil engineering provided by EU operators to Russian infrastructure projects. Architectural and engineering services were already banned.

## **FINANCIAL SECTOR MEASURES**

### **What would be the practical impact of such measures when Russia prohibits the use of foreign specialised financial messaging services for internal payments?**

By listing these entities, we are adapting our targets to developments in the Russian economy, which now relies more heavily on regional institutions, including for sanctions circumvention. These entities are handling cross border payments and are instrumental in circumventing our sanctions. This measure aims at combating the extension of business to the occupied territories.

## **What is the practical impact of listing new banks under the SPFS ban?**

The EU has the ability to prohibit transactions with financial institutions that use the System for Transfer of Financial Messages (SPFS) of the Central Bank of Russia to increase Russia's resilience and circumvent our sanctions. With this package, we list three entities due to their connection to this system.

More specifically, two of the entities are incorporated in Belarus and connected to the SPFS, using it with the deliberate intention of circumventing our measures. One entity is a branch of a listed Russian bank incorporated in China, which also participated in activities also aimed at circumventing our sanctions.

In practice, it is prohibited for EU operators to engage in any transaction with the listed entities above. These listings are a concrete demonstration of the EU's commitment to the fight against financial institutions that support the circumvention of our sanctions.

## **What is the expected impact of the extension of the transaction ban to third country financial institutions and crypto assets providers that participate in the circumvention of the Oil Price Cap and support the listed vessels of the shadow fleet?**

The new instrument enables the EU to prohibit EU operators from carrying out transactions with those financial institutions and crypto assets providers, thereby further strengthening the Oil Price Cap and constraining operations of the shadow fleet.

## **MEASURES AGAINST DISINFORMATION**

### **Why has the EU added further media outlets to the sanctions list?**

Russia has engaged in continuous and concerted propaganda, as well as information manipulation actions targeted at civil society in the EU and neighbouring countries, gravely distorting and manipulating facts, and disseminating misinformation in support of Russia's aggression against Ukraine. These propaganda actions have been channeled through a number of media outlets under the permanent direct or indirect control of the leadership of the Russian Federation.

In the 16<sup>th</sup> package, the EU has extended the prohibition to broadcast content to **8 Russian media outlets** (EADaily, Fondsk, Lenta, NewsFront, RuBaltic, SouthFront, Strategic Culture Foundation and Krasnaya Zvezda) because these are under the permanent control of the Russian leadership and systematically participate in spreading misinformation and propaganda, which constitutes a threat to the Union's public order and security.

The measures should be maintained until the aggression against Ukraine is put to an end, and until the Russian Federation and its associated outlets cease to conduct disinformation and information manipulation actions against the EU and its Member States.

### **What are the safeguards for freedom of expression and information?**

The sanctions do not target freedom of opinion. They include specific safeguards for freedom of expression and journalistic activities. The measures do not prevent the sanctioned outlets and their staff from carrying out other activities in the Union than broadcasting, such as research and interviews.

## **OTHER MEASURES**

### **Measures protecting EU operators: what has changed with the 16<sup>th</sup> package?**

These provisions were introduced in the 14th package and allow EU operators to claim damages for the loss they suffered because of a decision based on certain Russian legislation, or legal actions related to contracts the performance of which have been affected by the sanctions. The scope has been broadened, and some clarifications have been added. For instance, a new legal basis for EU courts to hear the claims was introduced when the national rules do not foresee such jurisdiction, avoiding possible situations of denial of justice. The provisions were also extended to cover additional Russian legislation, and persons from whom damages can be claimed.

## **What other horizontal provisions does the package include?**

- A number of amendments were made to ensure **better alignment** between the relevant sanctions regimes, with a view to **improving their implementation**. For instance, the 'best efforts' clause concerning non-EU subsidiaries of EU companies has been added to all Russia-related sanctions regimes.
- To **strengthen enforcement**, there is now a legal basis for more effective sharing of information on potential sanctions violations regarding financial intelligence units in Member States.
- To **better combat circumvention**, the sharing of information with like-minded third countries has also been made easier.

## **BELARUS ALIGNMENT PACKAGE**

In parallel to the 16th package of sanctions imposed on Russia, today the EU adopted a new set of sanctions on Belarus, in view of its involvement in Russia's illegal war of aggression against Ukraine. Given the close integration of Russian and Belarusian economies, the simultaneous adoption of the new sanctions measures on both Russia and Belarus makes EU sanctions on Russia more effective by closing existing loopholes, and ensuring that EU sanctions are not being circumvented via the territory of Belarus.

In particular, **the measures concern:**

**Trade:** Export restrictions on dual use and **advanced technology goods** have been extended, and new restrictions have been introduced on goods which could contribute to the enhancement of Belarusian industrial capacities, and oil and gas exploration software. Import of primary aluminum from Belarus has also been prohibited to limit Belarus from diversifying its sources of revenue, and to curtail circumvention of the restrictive measures on Russia via Belarus.

**Anti-circumvention:** To reduce the risk of circumvention with regard to sensitive goods, the prohibition on the transit of certain machinery and goods which could contribute in particular to the enhancement of Belarusian industrial capacities –via Belarus is expanded.

**Services:** The new rules introduce a prohibition of construction services, including civil engineering works, as well as the transfer of intellectual property rights or trade secrets related to prohibited software, to Belarus, its government and related entities is now restricted.

**Road transport:** The new rules introduce a ban on the possibility to increase Belarusian ownership in EU entities operating as road transport undertakings to 25% or more, to close a potential loophole for circumventing existing sanctions.

**Financial sector:** The new rules extend a ban on accepting deposits to deposits from legal persons, organisations or bodies established in non-EU countries and majority-owned by Belarusian nationals or natural persons residing in Belarus. Additionally, the acceptance of deposits for non-prohibited cross-border trade will be subject to a prior authorisation by national competent authorities. A prohibition on providing crypto-asset wallets, accounts, or custody services to Belarus is also introduced. This includes a prohibition on Belarusian persons owning or controlling entities providing such services.

**Other:** In addition, the package introduces the possibility for the Council to impose targeted measures against individuals or entities that form part of, support or, benefit from the military and industrial complex of Belarus. Also, to protect EU operators, the new measures facilitate the recovery of damages and improve the enforceability of the provisions. To strengthen enforcement, financial intelligence capabilities are being enhanced through more effective sharing of information on potential sanctions violations. Separately, the EU also decided today to apply increased import tariffs on the remaining agricultural products, and nitrogen-based fertilisers sourced from Russia and Belarus.

## **CRIMEA AND OBLASTS ALIGNMENT PACKAGE**

**What changes have been made to the sanctions regimes concerning Crimea and Sevastopol and the non-government-controlled areas of Donetsk, Kherson, Luhansk and Zaporizhzhia**

## oblasts (regions)?

These two regimes had not seen major amendments since their adoption in 2014 and 2022 respectively and have now been strengthened and brought up to date, in particular to better combat circumvention. This was done through:

- Wider export bans, now notably covering banknotes and certain high-risk goods and technology (cars and car parts, battlefield goods, electronics, machinery, aircraft parts);
- A new ban on services, ranging from architecture and engineering to IT and legal services, as well as certain types of software;
- Horizontal amendments designed to protect EU operators and, at the same time, strengthen compliance;
- Updating of legal wordings and removal of obsolete provisions.

The two regimes are almost identical in content, and the new amendments are also virtually identical.

The EU does not recognise, and continues to reject and condemn, the illegal annexation by Russia of Crimea and Sevastopol, as well as the Donetsk, Kherson, Luhansk and Zaporizhzhia regions. The EU remains dedicated to fully implementing its non-recognition policy. The EU also remains committed to using all diplomatic, economic, and legal instruments at its disposal to prevent the consolidation of Russia's illegal occupation and to support Ukraine's full restoration of sovereignty over its entire internationally recognised territory.

## For More Information

[Press release](#)

[European Commission website on Ukraine](#)

[Q&A on restrictive measures](#)

[Official Journal](#) (legal texts will be available soon)

QANDA/25/586

Press contacts:

[Olof GILL](#) (+32 2 29 65966)

[Marta PEREZ-CEJUELA ROMERO](#) (+32 2 29 63770)

General public inquiries: [Europe Direct](#) by phone [00 800 67 89 10 11](#) or by [email](#)