

Research Briefing

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# Sanctions against Russia: What has changed since January 2025?



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## Summary

The extensive sanctions regimes established by the UK, the EU, the US and other allies and partners, in response to the Russian invasion of Ukraine in February 2022, remain in place.

There has been concern among some commentators, however, that [sanctions coordination among allies, with respect to Ukraine](#), could unravel as the Trump administration pursues a different Ukraine strategy from that of the previous US administration.

## A US divergence from the EU and the G7?

Since January 2025, the Trump administration has not removed, or relaxed, any of the main sanctions against Russia for its actions in Ukraine that were imposed under previous administrations.

President Trump has said on several occasions that if Russia failed to engage in peace talks, or negotiate a peace agreement with Ukraine in good faith, the US would impose [further sanctions on Russia](#) in response.

However, in the first nine months of office, the Trump administration did not join the UK, the EU and other allies and partners in imposing any new sanctions on Russia, nor did it add any new individuals or entities to its Russia sanctions list. In July 2025, the US also did not support the lowering of the Oil Price Cap, which aims to limit Russian energy revenues that are being used to fund the conflict in Ukraine.

President Trump also appeared to favour imposing secondary sanctions against countries that have continued to trade with Russia, specifically those purchasing Russian oil. At the time of writing, however, India is the only country that has been subject to this additional tariff, despite [China being the largest importer of Russian oil globally](#). President Trump has also called on the EU and the other G7 countries to impose [tariffs of 50% to 100% on China and India](#) for their purchase of Russian oil. On 13 September 2025, he announced that the US was “[ready to do major sanctions on Russia](#)” but only when NATO member states stop buying oil from Russia.

## US sanctions on Russian oil

In October 2025, the US imposed direct sanctions on Russia for the first time under the Trump administration. The move coincided with the [cancellation of further face-to-face talks with President Putin](#) over a potential peace agreement in Ukraine.

The US Treasury said that sanctions on Russia's two largest oil companies, Rosneft and Lukoil, were [a direct result of Russia's "lack of serious commitment to a peace process to end the war in Ukraine"](#). The US also called on Russia to immediately agree to a ceasefire.

## UK and EU sanctions since January 2025

Since the beginning of 2025, the UK and the EU have continued to tighten sanctions against Russia, targeting strategic sectors of Russia's economy including Russia's defence industry, its banking sector, international finance and procurement networks, Russia's shadow fleet and its energy sector more broadly, those supporting and facilitating Russia's invasion of Ukraine and the occupation of the annexed territories, and those enabling sanctions evasion, including in third countries.

Measures designed to restrict Russia's energy revenues have included [lowering the Oil Price Cap](#), and in May 2025 the European Commission presented a roadmap for achieving [a total end to the EU's dependence on Russian energy](#). By the end of 2027, [imports of Russian oil and gas will be stopped](#) and Russian nuclear energy will be phased out.

Both the UK and the EU have financed the [purchase of military equipment for Ukraine using the proceeds from frozen Russian assets](#). However, the debate over the seizure of Russian state-owned assets as a means of supporting Ukraine remains ongoing.

The government has estimated that UK, EU and US [sanctions have denied Russia access to at least \\$450 billion](#) since February 2022. This includes \$285 billion in immobilised foreign currency reserves of the Russian Central Bank that is held within EU and G7 countries.

In October 2025, the Office for Financial Sanctions Implementation (OFSI) said that, as of May 2025, [£28.7 billion of assets linked to Russia had been frozen in the UK since 2022](#) (PDF).

At the time of writing:

- The UK has sanctioned 3,280 individuals, entities, and ships [under the Russia regime](#). Of those, 3,045 designations have been made since 24 February 2022.
- the [EU has sanctioned over 2,700 individuals and entities and 597 shadow fleet vessels](#).

Sanctions against Russia have also continued under other UK and EU regimes relating to human rights, chemical weapons, cyber and the broader hybrid threats posed by Russia.

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# 1 Background

Coordinated sanctions against Russia by the EU, US, UK and other allies such as Canada have been in place since 2014.

Sanctions against Russia were first imposed in response to the annexation of Crimea and the ongoing destabilisation of Ukraine. Those coordinated sanctions have since been expanded and strengthened in response to Russia's invasion of Ukraine in February 2022. It is this regime, as it relates to Ukraine, which is the focus of this briefing.

However, sanctions against Russian nationals and entities have also been imposed over the last decade in relation to human rights abuses in Russia, corruption, chemical weapon attacks and in response to Russian hybrid activity, or those activities below the threshold of conflict such as cyberattacks, sabotage, and the spreading of disinformation (all often referred to as activities in the 'grey zone').

In 2025, sanctions have been increasingly used by the EU and the UK to address the Russian hybrid threat and what the then head of the CIA, Bill Burns, and the head of MI6, Sir Richard Moore, said in September 2024 was a "reckless campaign of sabotage across Europe".<sup>1</sup> These sanctions regimes are examined in greater detail in Annex 1: Broader Russian sanctions.

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<sup>1</sup> [FT Live: CIA Director Bill Burns and MI6 Chief Sir Richard Moore talk to FT editor Roula Khalaf](#), 7 September 2024. See also Central Intelligence Agency, [Opinion Piece: Intelligence partnership helps the US and UK stay ahead in an uncertain world](#), 7 September 2024. In October 2024, the EU established [a new sanctions framework](#) specifically to address the hybrid threats posed by Russia.

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## 2 Sanctions relating to the Ukraine conflict

### 2.1 Overview: What has changed in 2025?

The extensive sanctions regimes that have been established since 2022 by the UK, the EU, the US and other allies and partners, remain in place.

There has been concern among some commentators, however, that sanctions coordination among allies, with respect to Ukraine, could unravel.<sup>2</sup>

Since entering office at the end of January 2025, President Trump has pursued a different approach to the Russia/Ukraine conflict from his predecessor, President Biden. The US has stopped all US-funded military assistance to Ukraine, prioritised efforts to secure a ceasefire and long-term peace agreement and been seeking a reset of US–Russia relations.<sup>3</sup>

#### Has there been a divergence between the US and its allies on Russian sanctions policy?

Except for a few de-listings of individuals and companies, the Trump administration has not removed, or relaxed, any of the main sanctions imposed against Russia for its actions in Ukraine under previous administrations.<sup>4</sup>

However, in the first nine months of office, the Trump administration did not join the UK, the EU and other allies and partners, in imposing any new sanctions on Russia, including on the anniversary of the Russian invasion.<sup>5</sup> Nor did the US add any new individuals or entities to its Russia sanctions list. Regarded as a significant divergence in policy coordination, in July 2025, the US did not support the lowering of the Oil Price Cap, which aims to limit

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<sup>2</sup> See Reuters, [“EU-US policy divide on Russian oil sales to India to hit October trade”](#), 11 September 2025; Brookings, [An update on the efficacy of sanctions against Russia](#), 21 August 2025

<sup>3</sup> All of these issues are examined in a series of Commons Library briefing papers which are accessible via the Library’s [Conflict in Ukraine collection](#).

<sup>4</sup> See for example, US Department of the Treasury, [Press release](#), 2 April 2025 and [Press release](#), 9 October 2025. Like the UK and the EU, the current [US sanctions regime against Russia](#), which relates to Ukraine, dates back to 2014. Detailed information on the sanctions imposed by the US after the Russian invasion of Ukraine in 2022 is provided in Commons Library research briefing, [Sanctions against Russia \(February 2022 to January 2025\)](#).

<sup>5</sup> Significant sanctions against Russia have been announced on previous anniversaries of the Russian invasion of Ukraine. See US Department of State, 2021–2025 archived content, [Press release](#), 24 February 2023 and [Press release](#), 23 February 2024

Russian energy revenues that are being used to fund the conflict in Ukraine (see [Lowering the Oil Price Cap](#)).<sup>6</sup>

In a separate move, and almost immediately after the new administration took office, in early February 2025 the US Department of Justice disbanded [Task Force KleptoCapture](#), the interagency law enforcement taskforce dedicated to implementing the US sanctions regime against Russia and targeting Russian oligarchs. The decision was reportedly taken in recognition of a shift in the department's priorities towards fighting drug cartels and transnational crime.<sup>7</sup> The US has also disbanded taskforces aimed at [combatting Russian disinformation](#) and [investigating war crimes in relation to the Ukraine conflict](#).

### US threatens to impose further sanctions

President Trump has said on several occasions that if Russia did not engage in peace talks or negotiate a peace agreement with Ukraine in good faith, the US would impose high tariffs and further sanctions on Russia in response.<sup>8</sup>

After his [meeting with President Putin in Alaska](#) on 15 August 2025, President Trump said that a decision would be taken within two weeks on the US response if no progress toward peace talks was made. Responding to a question from CNN on 22 August he said that “massive sanctions or massive tariffs” on Russia were one possible option.<sup>9</sup>

In the interim, President Trump appeared to favour imposing secondary sanctions on countries that have continued to trade with Russia, specifically those purchasing Russian oil. On 6 August 2025, President Trump issued an Executive Order announcing that additional tariffs of 25% would be imposed on Indian goods entering the US (in addition to [the 25% tariff on Indian goods already in place](#)), in direct response to India's import of Russian oil (both directly and through third countries). At the time of writing, India is the only country that has been subject to this additional 25% tariff, despite China being the largest importer of Russian oil globally.<sup>10</sup> The Indian Foreign Ministry has called the tariffs “unfair, unjustified and unreasonable”.<sup>11</sup>

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<sup>6</sup> Reuters, “[EU-US policy divide on Russian oil sales to India to hit October trade](#)”, 11 September 2025

<sup>7</sup> “[From oligarchs to cartels: The US reshapes global law enforcement](#)”, Radio Free Europe, 7 February 2025; “[Trump administration disbands taskforce targeting Russian oligarchs](#)”, Reuters, 6 February 2025 and “[Kleptocrats to benefit from Trump DoJ's anti-corruption pause, experts say](#)”, The Guardian, 10 March 2025

<sup>8</sup> CNN, “[Trump's empty threats on Russia sanctions](#)”, 18 August 2025 and Times Radio, “[Trump's Russia sanctions threats are all talk, no action](#)”, 15 September 2025

<sup>9</sup> CNN News Central, [Transcript](#), 22 August 2025

<sup>10</sup> Centre for Research on Energy and Clean Air, [October 2025 – Monthly analysis of Russian fossil fuel exports and sanctions](#), 13 November 2025. Section 5 of the [Executive Order](#) does, however, provide for the imposition of this additional 25% tariff on any other country that is determined to be “directly or indirectly importing Russian Federation oil”.

<sup>11</sup> Indian Ministry of External Affairs, [Statement by official spokesperson](#), 6 August 2025. This issue is examined in Commons Library research briefing, [Sanctions against Russia: Targeting third countries](#)

In an interview with NBC's Meet the Press in early September, the US Treasury Secretary, Scott Bessent, said that the US was "prepared to increase pressure on Russia" but that "we need our European partners to follow us".<sup>12</sup> The Financial Times reported on 11 September 2025 that the US had subsequently called on both the EU and the other G7 countries (Canada, the UK, Italy, Germany, France and Japan) to impose tariffs of 50% to 100% on China and India for their purchase of Russian oil.<sup>13</sup>

On 13 September 2025, President Trump also announced that the US was "ready to do major sanctions on Russia" but only when NATO member states stop buying oil from Russia.<sup>14</sup> Hungary and Slovakia have negotiated exemptions from existing EU prohibitions on the import of Russian oil, while Turkey remains the third-largest importer of Russian oil, behind China and India.<sup>15</sup> Despite these calls, however, in early November 2025, the United States reportedly granted Hungary a one-year exemption from Russian energy-related tariffs.<sup>16</sup>

President Trump also called for NATO countries to impose "50% to 100% tariffs on China", to be withdrawn after the Russia/Ukraine conflict has ended. President Trump suggested in a post on Truth Social that "China has a strong control, and even grip, over Russia" and that such tariffs would "break that grip".<sup>17</sup>

While the latest packages of UK and EU sanctions have measures on companies and facilitators in third countries trading in Russian oil in their scope (see below), many analysts consider that President Trump's demands on tariffs are unlikely to be met. The [EU and the UK are considered unlikely to enter into a trade war with China](#). The EU is also currently [negotiating a trade agreement and a defence and security partnership](#) with India. The UK and India signed a trade deal in July 2025 and have been [pursuing deeper defence ties](#).<sup>18</sup> For the EU, tariffs are also a trade tool (as opposed to a foreign policy tool), and are therefore within the competence of the European Commission.<sup>19</sup>

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<sup>12</sup> NBC News, [Meet the Press](#), 7 September 2025

<sup>13</sup> The Financial Times, ["US urges G7 to impose up to 100% tariffs on China and India over Russian oil"](#), 11 September 2025 and ["Donald Trump tells EU to hit China and India with 100% tariffs to pressure Vladimir Putin"](#), 9 September 2025 (subscription required)

<sup>14</sup> Donald J Trump, [@realDonaldTrump](#), Truth Social, 13 September 2025 (accessed 16 September 2025)

<sup>15</sup> Centre for Research on Energy and Clean Air, [October 2025 – Monthly analysis of Russian fossil fuel exports and sanctions](#), 13 November 2025

<sup>16</sup> BBC News, ["Trump gives Hungary one year exemption from Russian energy sanctions"](#), 7 November 2025

<sup>17</sup> Donald J Trump, [@realDonaldTrump](#), Truth Social, 13 September 2025 (accessed 16 September 2025)

<sup>18</sup> Department for Business and Trade, [UK – India trade deal](#). See also The Financial Times, ["US urges G7 to impose up to 100% tariffs on China and India over Russian oil"](#), 11 September 2025; The Times, ["Trump: Moscow sanctions only when NATO stops buying Russian oil"](#), 14 September 2025

<sup>19</sup> See also Politico, ["EU plans more sanctions on China. Will that be enough for Trump?"](#), 16 September 2025

October 2025 - the Trump administration imposes sanctions on Russian oil for the first time.

## US imposes sanctions on Russian oil in a 'first' for the Trump administration

In October 2025, President Trump cancelled further face-to-face talks with President Putin, that had been expected to take place in Hungary, saying that “every time I speak with Vladimir, I have good conversations, and then they don’t go anywhere”.<sup>20</sup>

The US Treasury subsequently announced sanctions on Russia’s two largest oil companies: Rosneft and Lukoil, including several of their overseas subsidiaries, which it said was a direct result of Russia’s “lack of serious commitment to a peace process to end the war in Ukraine”. The US also called on Russia to immediately agree to a ceasefire.<sup>21</sup> Combined, Rosneft and Lukoil account for nearly half of Russia’s crude oil exports and 5 to 6% of global supply.<sup>22</sup>

The move came two days after similar action by the UK (see below). On the imposition of US sanctions, President Trump said, “I just felt it was time” and that he hoped the sanctions would force a breakthrough in peace negotiations. The US has indicated that the sanctions could be “swiftly withdrawn” if a peace agreement was reached.<sup>23</sup>

Responding to media questions on 23 October, President Putin dismissed the economic impact of the US sanctions saying that “they will have serious implications for us, but they will not significantly affect our economic well-being”. He also suggested that the move “represents an unfriendly step with regard to Russia” and that “actions like this by the US administration harm Russia-US relations”.<sup>24</sup>

## 2.2

## UK sanctions introduced since January 2025

Since the beginning of 2025, and in concert with the EU, the UK has tightened sanctions against Russia, continued to target Russia’s shadow fleet and implemented further measures designed to restrict Russia’s energy revenues (see below). It has also financed the purchase of military equipment for Ukraine using the proceeds from frozen Russian assets.<sup>25</sup>

<sup>20</sup> CNN, “[How Trump’s plan for a Budapest summit with Putin turned into sanctions on Russia](#)”, 24 October 2025

<sup>21</sup> US Treasury, [Press release](#), 22 October 2025

<sup>22</sup> Center for European Policy Analysis, [US oil sanctions on Russia: progress](#), 28 October 2025; Oxford Economics, [Sanctions tighten: US targets the financial lifelines of Russian oil exports](#), 28 October 2025 and Foreign, Commonwealth and Development Office, [Press release](#), 15 October 2025

<sup>23</sup> BBC News, “[Trump says Putin talks ‘don’t go anywhere’ as he imposes new sanctions](#)”, 22 October 2025

<sup>24</sup> President of Russia, [Answers to media questions](#), 23 October 2025

<sup>25</sup> Prime Minister’s office, [Press release](#), 25 June 2025. This is examined in more detail in Library Research briefing, [Detailed timeline of UK military assistance to Ukraine \(February 2022 to present\)](#)

The debate over the seizure of Russian state-owned assets within the UK is also ongoing.<sup>26</sup> The government has reiterated the need to act in concert with others, given that the majority of Russian state assets are held outside of the UK's jurisdiction.<sup>27</sup> In a joint statement on 10 October 2025, the leaders of the E3 countries (UK, Germany and France) said they were “ready to progress towards using, in a coordinated way, the value of the immobilised Russian sovereign assets to support Ukraine’s armed forces and thus bring Russia to the negotiation table” and that they would do so in “close cooperation with the United States of America”.<sup>28</sup>

The UK Government has previously expressed support for the EU proposal for a €140 billion ‘[reparations loan](#)’ to Ukraine, financed using the immobilised assets of the Russian Central Bank (see [Debate on the seizure of Russian state-owned assets](#)).<sup>29</sup> Defence Secretary John Healey has also expressed support for the idea of using oil seized from sanctioned Russian oil tankers to support Ukraine.<sup>30</sup>

As of 25 February 2026, the UK has sanctioned 3,280 individuals, entities and ships under the Russia regime. This includes 3,045 designations since 24 February 2022. Of those designations:<sup>31</sup>

- 1,840 are individuals (1,657 since February 2022)
- 828 are entities (776 since February 2022)
- 612 are ships.

Further designations have also been made under the UK’s cyber and chemical weapons sanctions regimes (see [Annex 1: Broader Russian sanctions](#)).

The government has estimated that UK, EU and US sanctions have denied Russia access to at least \$450 billion since February 2022. This includes \$285 billion in immobilised foreign currency reserves of the Russian Central Bank that is held within EU and G7 countries.<sup>32</sup>

In October 2025, the Office for Financial Sanctions Implementation (OFSI) said that, as of May 2025, £28.7 billion of assets linked to Russia had been frozen in the UK since 2022.<sup>33</sup>

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<sup>26</sup> The legal debate around the seizure of frozen Russian state-owned assets is examined in Commons Library briefing paper, [Sanctions, international law and seizing Russian assets](#)

<sup>27</sup> [HC Deb 17 July 2025](#), c481

<sup>28</sup> Prime Minister’s Office, [Joint E3 leaders statement](#), 10 October 2025

<sup>29</sup> HC Deb 15 October 2025, [Ukraine](#), c392

<sup>30</sup> Defence Committee, [Oral evidence: The work of the Secretary of State for Defence](#) (PDF), HC973, 27 January 2026

<sup>31</sup> Gov.uk, [The Sanctions List](#) (accessed 26 February 2026)

<sup>32</sup> HM Government, [UK support to Ukraine: Factsheet](#) (PDF), accessed 26 February 2026 and Foreign, Commonwealth and Development Office, [Estimating the impact of sanctions on Russia’s war efforts](#), June 2025

<sup>33</sup> Office for Financial Sanctions Implementation, [Annual Review 2024-25](#) (PDF), October 2025

## 1 Legislative basis for UK sanctions against Russia

The [Russia \(Sanctions\) \(EU exit\) \(Amendment\) Regulations 2022](#) were published on 10 February 2022. The regulations amended the sanctions designation criteria initially set out in the [Russia \(Sanctions\) \(EU exit\) Regulations 2019](#), which had been established to ensure that sanctions relating to Russia continued to be implemented after the UK left the EU.

Those [regulations have been amended frequently over the last three years](#) as more sanctions measures have been announced. Notably, the government has expanded the criteria for those who could be subject to sanctions, and increasingly targeted third parties for their role in enabling sanctions evasion.

In June 2023, the government also introduced legislation enabling sanctions to be maintained against Russia until it pays compensation to Ukraine ([Russia \(Sanctions\) \(EU Exit\) \(Amendment\) \(No.2\) Regulations 2023](#)). The [purpose of sanctions against Russia](#) are to:

- encourage Russia to cease actions destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine
- promote the payment of compensation by Russia for damage, loss or injury suffered by Ukraine on or after 24 February 2022 as a result of Russia's invasion of Ukraine

## New sanctions

The UK has continued to use the full extent of its legal powers to sanction individuals with ties to the Russian Government, Russian officials, those facilitating the Russian invasion of Ukraine and spreading disinformation, companies and organisations within strategic sectors of the Russian economy, those linked to the Russian defence sector and broader military supply chains, and international procurement and sanctions evasion networks.<sup>34</sup> The latest package of sanctions was announced on 24 February 2026, the fourth anniversary of the Ukraine conflict. The government said the package is “the largest since the early months of the invasion in 2022”.<sup>35</sup>

The government has also taken several new steps, which are outlined below.

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<sup>34</sup> Foreign, Commonwealth and Development Office, [Press release](#), 14 February 2025; [Press release](#), 24 February 2025; [Press release](#), 20 May 2025; [Press release](#), 17 June 2025; [Factsheet: GRU Cyber and hybrid threat operations](#), 18 July 2025; [Press release](#), 21 July 2025; [Press release](#), 12 September 2025; [Press release](#), 15 October 2025; [Press release](#), 4 December 2025; [Policy Paper](#), 9 December 2025; [Press release](#), 18 December 2025 and Prime Minister's Office, [Press release](#), 9 May 2025. Sanctions evasion is also discussed in more detail in Commons Library briefing, [Sanctions against Russia: Targeting third countries](#)

<sup>35</sup> Foreign, Commonwealth and Development Office, [Press release](#), 24 February 2026

In an article for The Times on 27 October 2025, the Foreign Secretary, Yvette Cooper, said “now is the time for fresh economic pressure to deprive the Kremlin of war revenues and push Putin to the negotiating table”.<sup>36</sup>

### Targeting foreign financial institutions

In February 2025, the UK sanctioned, for the first time, a third-party financial institution based in Kyrgyzstan in an effort to disrupt “Russia’s use of the international financial system to support its war efforts”.<sup>37</sup>

Accusing Russia of exploiting the Kyrgyz financial sector to evade sanctions by channelling money through “opaque financial networks, including through the use of cryptocurrencies”, the government announced further designations in August 2025.<sup>38</sup>

The power of the government to target those providing financial services or making funds available to “any designated person or entity supporting, or benefitting from, the Russian Government” was provided in the [Russia \(Sanctions\) \(EU Exit\) \(Amendment\) \(No.3\) Regulations 2024](#), first introduced in May 2024 (as the [No.2 regulations](#)) and replaced in July 2024.<sup>39</sup>

The UK has also continued to target Russian financial institutions assisting the Russian state in evading sanctions.<sup>40</sup>

The US began to take similar secondary measures against foreign financial institutions at the end of 2023.<sup>41</sup>

### Further export and import restrictions

Since 2022, the UK has implemented extensive prohibitions on the export of goods and services to Russia and the import of Russian and Russian-origin goods into the UK, including through third countries.<sup>42</sup>

A new tranche of trade restrictions entered into force in April 2025, enabled by the [Russia \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2025](#), which bring the UK into line with existing EU sanctions:

- An export ban on chemicals that are used as riot control agents (and which are assessed to have been used by Russian forces), electronics, machinery, plastics and metals which have military or industrial uses,

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<sup>36</sup> Foreign, Commonwealth and Development Office, [For peace in Ukraine, we must go after Russia’s money: Foreign Secretary’s article](#), 27 October 2025

<sup>37</sup> Foreign, Commonwealth and Development Office, [Press release](#), 24 February 2025

<sup>38</sup> Foreign, Commonwealth and Development Office, [Press release](#), 20 August 2025

<sup>39</sup> The regulations were re-introduced to meet the requirements for parliamentary scrutiny as set out by the Sanctions and Anti-Money Laundering Act 2018 and did not implement any new measures.

<sup>40</sup> Foreign, Commonwealth and Development Office, [Press release](#), 20 May 2025

<sup>41</sup> This is examined in section 3.1 of Commons Library briefing, [Sanctions against Russia \(February 2022 to January 2025\)](#)

<sup>42</sup> Department for Business and Trade, [Trading under sanctions with Russia](#)

and related ancillary services (technical assistance, financial services and funds, brokering services).

- A ban on the import of synthetic diamonds processed in third countries, in line with existing sanctions on the import of Russian diamonds processed in third countries, and helium, which the government assesses is becoming an important source of revenue for the Russian Government. The ban also extends to the provision of ancillary services.
- Prohibitions on the transfer of technology (such as intellectual property, industrial knowledge, trade secrets and information contained in blueprints and designs) related to a range of goods already subject to export sanctions. These are wide-ranging and include any goods of strategic importance to Russia's military-industrial and economic development.<sup>43</sup>
- A ban on the transfer of software via intangible means (download or cloud-based systems for example), related to business enterprise, industrial design and the oil and gas sector. The provision of related ancillary services is also prohibited.<sup>44</sup>

In October 2025, the government announced that an import ban on oil products refined in third countries from Russian-origin crude oil, will be introduced. The move will close [a loophole in the existing sanctions regime](#), although the government did not announce when that prohibition would take effect (see below).<sup>45</sup>

### Excluding Kremlin-linked elites from the UK

There are longstanding powers in UK immigration law to exclude foreign nationals from the UK if their presence is not conducive to the public good.<sup>46</sup>

In February 2025, the government expanded the exclusion criteria so that, for as long as Russia is considered an acute national security threat, the Home Office can consider for exclusion people who have known financial, political or governmental ties to the Russian state. The government says the exclusion criteria won't target ordinary Russians but the most senior and influential individuals. It says:

This category will consider any individual who:

- provides significant support to the Russian state,

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<sup>43</sup> Existing technology transfer controls under the 2019 regulations only apply to certain categories of military-related goods.

<sup>44</sup> Prohibitions already exist in relation to software provided by tangible means (for example on a flash drive or the hard drive of a computer). [Explanatory Memorandum to the Russia \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2025](#) (PDF), April 2025

<sup>45</sup> Foreign, Commonwealth and Development Office, [Press release](#), 15 October 2025 and HC Deb 15 October 2025, [Ukraine](#)

<sup>46</sup> House of Commons Library, [Visa bans](#), CBP 7035, 4 April 2024

- and/or owes their significant status or wealth to the Russian state,
- and/or has access to the highest levels of the Russian state.<sup>47</sup>

### Sanctioning those involved in ‘Russification’ of the occupied territories and erasing Ukrainian cultural heritage

Several individuals and youth organisations have already been sanctioned by the UK for facilitating and supporting Russia’s occupation of the Donetsk, Luhansk, Kherson and Zaporizhzhia Oblasts, including participation in the re-education and/or forcible deportation of thousands of Ukrainian children to Russia.

The government has accused Russia of attempting to “legitimise its illegal control of sovereign Ukrainian territory” and, in September 2025, said that Russia was pursuing a “long-standing Russification policy” in those occupied territories, in an attempt to “eradicate Ukrainian culture, identity and statehood”.<sup>48</sup> Part of that Russification policy, it has been suggested, is to re-educate and prepare young Ukrainians for service in the Russian armed forces.<sup>49</sup>

Further designations of Russian officials and state-linked youth organisations have followed. The government continues to call for the “unconditional” return of all Ukrainian children that have been forcibly transferred and deported.<sup>50</sup>

### Extending existing sanctions: Targeting Russia’s shadow fleet and restricting Russia’s energy revenues

The Russian energy sector is the government’s largest revenue stream (around 30% of Russian state revenues).<sup>51</sup> In an effort to restrict this important source of income, prohibitions on the import into the UK of Russia-origin oil and gas and related products are in place. Companies and individuals operating within Russia’s energy sector have been the target of sanctions since the outset and those designations continue.<sup>52</sup>

In October 2025 the UK sanctioned Russia’s two largest oil companies, Rosneft and Lukoil. The government also announced sanctions on “enablers” of Russia’s energy sector, including companies in India and China facilitating

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<sup>47</sup> WS458, [Home Office changes to exclusions guidance](#), 24 February 2025 and Home Office, [Press release](#), 24 February 2025

<sup>48</sup> Foreign, Commonwealth and Development Office, [Press release](#), 26 September 2022; [Press release](#), 29 September 2023 and [Press release](#), 3 September 2025

<sup>49</sup> Foreign, Commonwealth and Development Office, [Press release](#), 3 September 2025

<sup>50</sup> As above

<sup>51</sup> Oxford Institute for Energy Studies, [Follow the money: Understanding Russia’s oil and gas revenues](#), March 2024

<sup>52</sup> Foreign, Commonwealth and Development Office, [Press release](#), 24 February 2025; [Press release](#), 15 October 2025

the trade in Russian-origin oil.<sup>53</sup> Sanctions on Rosneft and Lukoil have also been adopted by the US, a move that has been welcomed by the Foreign Secretary who said that “collective efforts will make the greatest difference”.<sup>54</sup> The designations of four of Russia’s largest oil companies were also announced in December 2025.<sup>55</sup> In February 2026 the UK also designated one of the world’s largest oil pipeline companies, PJSC Transneft, which transports 80% of Russian oil exports.<sup>56</sup>

As a result of energy sanctions, the government has suggested that Russian oil revenues have hit their lowest level since February 2022, falling over a quarter in 2025.<sup>57</sup>

### Lowering the Oil Price Cap

In December 2022, the G7 countries imposed an Oil Price Cap (OPC), with the purpose of reducing Russian revenues and its ability to fund “its war of aggression”, while also limiting the effect of the conflict on global energy prices, particularly for low-income and middle-income countries”.<sup>58</sup> The aim of the OPC is to prohibit access to vessels and the provision of services, such as insurance and finance, which enable maritime transportation of Russian-origin crude oil and petroleum products globally, unless such products are purchased at, or below, a designated price cap. Many of those services are provided within G7 countries.<sup>59</sup> The OPC does not impose a blanket ban on the provision of these services by UK service providers.

The UK and the EU indicated in May 2025 that they were examining the possibility of lowering the OPC to further restrain Russian oil revenues.<sup>60</sup>

In July 2025, the UK and the EU announced that the OPC would be lowered from \$60 a barrel to \$47.60 and that the price cap will be dynamically adjusted in future to ensure that it remains 15% below the average price of Russian Urals crude oil over the previous six-month period.<sup>61</sup> The already established price caps on high-value refined oil products, such as diesel and petrol (\$100) and low-value refined oil products, such as fuel oil (\$45), remain the same.

The new price cap came into effect on 2 September 2025.<sup>62</sup> The Chancellor of the Exchequer, Rachel Reeves, said that the move would target Russia’s oil

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<sup>53</sup> Foreign, Commonwealth and Development Office, [Press release](#), 15 October 2025. Sanctions against third countries is examined in Commons Library briefing, [Sanctions against Russia: Targeting third countries](#)

<sup>54</sup> Foreign, Commonwealth and Development Office, [For peace in Ukraine, we must go after Russia’s money: Foreign Secretary’s article](#), 27 October 2025

<sup>55</sup> Foreign, Commonwealth and Development Office, [Press release](#), 18 December 2025

<sup>56</sup> Foreign, Commonwealth and Development Office, [Press release](#), 24 February 2026

<sup>57</sup> Foreign, Commonwealth and Development Office, [Press release](#), 18 December 2025

<sup>58</sup> [G7 statement of Finance Ministers](#), 2 September 2022

<sup>59</sup> PQ34073, [Oil: Russia](#), 6 March 2025

<sup>60</sup> [Press release](#), 20 May 2025

<sup>61</sup> Bank of Finland Blog, [New oil price cap adds to Russia’s economic distress](#), 8 August 2025

<sup>62</sup> Foreign, Commonwealth and Development Office, [Press release](#), 18 July 2025

revenues “while keeping energy markets stable”.<sup>63</sup> Canada, New Zealand and Japan have all supported the move.<sup>64</sup>

The US, however, did not support lowering the price cap and has not implemented it. President Trump has, instead, favoured imposing tariffs on countries buying Russian oil. So far, India, the largest importer of Russian oil, has been targeted with 50% tariffs on Indian goods entering the US.<sup>65</sup>

There is some debate among analysts as to whether the change in the OPC will make any substantial long-term difference, with evidence that oil cargoes destined for India have been diverted to China instead. The split in policy between the US and the UK/EU has also raised concerns that compliance with the OPC will weaken in the longer term.<sup>66</sup>

On 31 January 2026, the Oil Price Cap was lowered again under the new dynamic pricing mechanism to \$44.10 per barrel. Again, the United States has not implemented the change.<sup>67</sup>

### Countering the Russian ‘shadow fleet’

To evade sanctions [Russia has employed an estimated 600-strong shadow fleet](#) (ageing vessels with obscure ownership, which are uninsured, registered in countries which do not support sanctions (flag states), and often environmentally unsound) to transport Russian oil and gas around the globe in contravention of the oil price cap.

The UK, and other allies and partners have committed to [addressing the risks posed by the shadow fleet](#), and since mid-2024 the [UK has been imposing sanctions on suspected vessels](#). The Department of Transport has also been working alongside the [Joint Maritime Security Centre](#) and the Maritime and Coastguard Agency to challenge suspected shadow fleet vessels to provide details of their insurance status as they pass through UK waters.<sup>68</sup> In December 2024, the UK, Denmark, Sweden, Poland, Estonia and Finland also agreed a new partnership to challenge suspected vessels along the Baltic route.<sup>69</sup>

In addition to transporting Russian oil in contravention of the OPC, such vessels are also alleged to be transporting military equipment destined for Russia, transporting stolen Ukrainian grain, gathering intelligence and sabotaging critical underseas infrastructure.<sup>70</sup> In early January 2025, the

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<sup>63</sup> Foreign, Commonwealth and Development Office, [Press release](#), 18 July 2025

<sup>64</sup> The Kyiv Independent, [“Japan slaps new sanctions on Russia over Ukraine war, lowers oil cap”](#), 12 September 2025

<sup>65</sup> This is examined in more detail in Commons Library briefing paper, [Sanctions against Russia. Targeting third countries](#)

<sup>66</sup> Reuters, [“EU-US policy divide on Russian oil sales to India to hit October trade”](#), 11 September 2025

<sup>67</sup> The Export Practitioner, [“UK and EU lower Russian oil price cap, US holds at \\$60”](#), 15 January 2026

<sup>68</sup> Foreign, Commonwealth and Development Office, [Press release](#), 17 October 2024

<sup>69</sup> Prime Minister’s Office, [Joint Statement by the Nordic-Baltic 8++ countries](#), 16 December 2024

<sup>70</sup> See RAND, [Countering Russia’s shadow fleet](#), January 2025 and Council of the European Union, [Press release](#), 18 July 2025

Ministry of Defence announced that the UK-led [Joint Expeditionary Force](#) had activated Operation Nordic Warden, which will track potential threats to undersea infrastructure and monitor the movements of Russia's shadow fleet.<sup>71</sup>

In 2025, the UK Government has continued to designate vessels alleged to be part of the Russian shadow fleet.<sup>72</sup> Under those sanctions, designated vessels are banned from entering UK ports, accessing UK maritime services, and are at risk of being detained in UK territorial waters.

Since May 2025, sanctions have also been extended to the individuals and entities enabling the operation of that fleet, including ship captains and those responsible for procuring, registering, crewing and managing those vessels.<sup>73</sup> In June 2025, the UK also sanctioned the Russian military agency responsible for developing Russia's underwater intelligence gathering operations (GUGI).<sup>74</sup>

In June 2025, the countries of the [Nordic-Baltic 8++ group](#), including the UK, issued a statement reiterating that stateless vessels (unregistered ships with no 'flag state') and falsely flagged vessels are not entitled to rights under the [UN Convention on the Law of the Sea](#), including freedom of navigation, and that any vessel failing to fly a valid flag in the North Sea or Baltic Sea would be dealt with in accordance with international law.<sup>75</sup>

In January 2026 the UK assisted the United States in seizing a sanctioned vessel (Bella 1/ Marinera) that was falsely flagged. US action was based on counter-Iran sanctions, but the operation has been linked to activities of shadow fleet vessels more generally. In a statement to the House of Commons, Defence Secretary John Healey said that the Bella 1 is a "sanctioned, stateless vessel which carries a long history of nefarious activity and shares close links with both Iran and Russia" and that the UK had acted, in part, to counter this "expanding global security threat".<sup>76</sup> The government has suggested that the international legal basis exists for the seizure of further vessels, although at the time of writing, UK military personnel have

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<sup>71</sup> Ministry of Defence, [Press release](#), 6 January 2025

<sup>72</sup> Foreign, Commonwealth and Development Office, [Press release](#), 24 February 2025; [Press release](#), 9 May 2025; [Press release](#), 20 May 2025; [Press release](#), 12 September 2025; [Press release](#), 15 October 2025; [Sanctions notice](#), 24 February 2026 (PDF)

<sup>73</sup> Foreign, Commonwealth and Development Office, [Press release](#), 20 May 2025; [Press release](#), 17 June 2025 and [Press release](#), 21 July 2025

<sup>74</sup> Foreign, Commonwealth and Development Office, [Press release](#), 17 June 2025

<sup>75</sup> Foreign, Commonwealth and Development Office, [NB8++ joint statement on the shadow fleet](#), 20 June 2025. Every ship is registered under a flag state, which is not necessarily the same as the country where the ship's owner is located. A ship is bound by the laws of the flag state under which it is registered, and the flag state has overall responsibility for the implementation and enforcement of international maritime regulations by all the ships which fly its flag. See The Mission to Seafarers, [Flag States](#)

<sup>76</sup> Ministry of Defence, [Oral statement to Parliament](#), 7 January 2026

not seized any sanctioned vessels in UK waters.<sup>77</sup> In evidence to the Defence Select Committee in late January 2026, the Defence Secretary also suggested that the UK would support using the oil from seized sanctioned vessels to financially support Ukraine.<sup>78</sup>

The government has said that the UK has sanctioned more shadow fleet vessels than any other country.<sup>79</sup> As of 26 February 2026, 612 vessels in the Russian shadow fleet have been sanctioned.<sup>80</sup>

### **Closing a sanctions loophole – an import ban on oil products refined in third countries**

As outlined above, in October 2025 the government announced that an import ban on oil products refined in third countries from Russian-origin crude oil, will also be introduced. The government had previously said that while importers of oil products into the UK are required to provide evidence that goods are not of Russian origin, “in line with WTO [World Trade Organization] rules of origin, Russian oil which has been substantially processed in a third country is no longer considered to be of Russian origin”.<sup>81</sup> The EU announced such measures in July 2025 (see below).

At the time of writing, implementing legislation has yet to be introduced and it is unclear when this import ban will take effect. In contrast, the [EU ban on such imports took effect on 21 January 2026](#).

### **Closing a loophole – maritime services ban related to the export of Russian LNG**

At a meeting of G7 foreign ministers in Canada in November 2025, the UK Foreign Secretary also announced that the UK would establish a maritime services ban related to the export of Russian Liquefied Natural Gas. A ban on the import to the UK of Russian LNG was implemented in 2023. However, that prohibition did not extend to British firms providing maritime services to the Russian LNG sector as a whole.<sup>82</sup>

At the beginning of February 2026, the government said that the ban is expected to be in place by the end of 2026.<sup>83</sup> Several commentators, including the Business and Trade Sub-Committee on Economic Security, Arms

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<sup>77</sup> See Defence Committee, [Oral evidence: The work of the Secretary of State for Defence](#) (PDF), HC973, Q.185, 27 January 2026; BBC Verify, ["Dozens of sanctioned Russian tankers navigate Channel despite UK vow of assertive action"](#), 23 January 2026 and The Observer, ["Britain slow to act against Kremlin's shadow fleet of sanctions busting tankers"](#), 3 February 2026

<sup>78</sup> Defence Committee, [Oral evidence: The work of the Secretary of State for Defence](#) (PDF), HC973, 27 January 2026

<sup>79</sup> Foreign, Commonwealth and Development Office, [Press release](#), 9 May 2025

<sup>80</sup> Gov.uk, [The Sanctions List](#) (accessed 26 February 2026)

<sup>81</sup> PQ44634, [Oil: Russia](#), 22 April 2025. Further UK guidance on the import of Russian-origin oil and oil products is available from the Department for Business & Trade, UK ban on [Russian oil and oil products](#)

<sup>82</sup> Foreign, Commonwealth and Development Office, [Press release](#), 12 November 2025

<sup>83</sup> PQ109565, [Russia: Liquefied Natural Gas](#), 5 February 2026

and Export Controls, have criticised the speed at which both of these measures will take effect in the UK.<sup>84</sup> According to the latest figures from the Centre for Research on Energy and Clean Air (CREA), in January 2026 the UK imported €24 million worth of oil products from India, Turkey and Brunei refined from Russian-origin crude oil. That figure was, however, a 30% decrease on the previous month.<sup>85</sup> Over the course of the conflict, CREA estimates that the UK has imported a total of £1.6 billion of products made from Russian crude oil.<sup>86</sup>

In addition to the maritime services ban relating to Russian LNG, Trade Minister Chris Bryant indicated at the end of February 2026 that the government would also be supportive of a full maritime services ban in relation to Russian crude oil and oil-related products. FCDO officials confirmed that discussions were ongoing with European partners (see Consideration of a 20<sup>th</sup> sanctions package).<sup>87</sup>

## New legislation to address sanctions evasion through third countries

Giving evidence to the Business and Trade Sub-Committee on Economic Security, Arms and Export Controls at the end of February 2026 the Trade Minister, Chris Bryant, also indicated that the government would be bringing new legislation forward to target sanctions evasion and the export of goods to third countries which are then re-directed to Russia.

He confirmed that the UK already has a list of countries of concern with respect to diversion (Armenia, Kazakhstan, Kyrgyzstan, Uzbekistan, Serbia, Turkey, Thailand, India, UAE, Vietnam, China, and Malaysia).

No timetable for the new legislation has been announced, although Mr Bryant indicated the desire to see the legislation introduced in 2026.<sup>88</sup>

## 2 Useful documents and guidance

- HM Government, [Russian invasion of Ukraine: UK government response](#)
- [The UK Sanctions List](#). This is a searchable database across all UK sanctions regimes (geographic and thematic). It includes individuals,

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<sup>84</sup> HC Deb 9 February 2026, [UK-India Free Trade Agreement](#), c604-605 and Business and Trade Sub-Committee on Economic Security, Arms and Export Controls, [The UK's trade and sanctions regime - oral evidence](#), 25 February 2026

<sup>85</sup> Centre for Research on Energy and Clean Air (CREA), [January 2026- Monthly analysis of Russian fossil fuel exports and sanctions](#), 18 February 2026

<sup>86</sup> Politico, ["Britain 'writing the Kremlin cheques' with Russian oil loophole"](#), 20 January 2026

<sup>87</sup> Business and Trade Sub-Committee on Economic Security, Arms and Export Controls, [The UK's trade and sanctions regime - oral evidence](#), 25 February 2026

<sup>88</sup> As above

companies and organisations and ships. Since January 2026, the government has moved to this single list for all sanctions designations.

- Foreign, Commonwealth and Development Office, [Guidance: Russia list of designations and sanctions notices](#)
- Foreign, Commonwealth and Development Office, [Collection: Russia sanctions regime, Industry and specialist guidance](#). This page collates all the government's guidance on Russian sanctions; sanctioned persons, banks, companies, goods and services; maritime services and the Oil Price Cap and sanctions evasion.
- HM Government, [Russia sanctions: guidance](#). This page provides a list of the legislation that underpins the Russia sanctions regime.
- The government has established an Export Support Team and [online query service](#) to help UK businesses trading with Ukraine, Russia and Belarus.
- HM Government, [UK support to Ukraine: Factsheet](#) (PDF). A summary of the assistance that the UK has been providing to Ukraine since 2022.
- Foreign, Commonwealth and Development Office, [Estimating the impact of sanctions on Russia's war efforts](#), June 2025

## 2.3

## EU sanctions since January 2025

### The EU's 16th, 17<sup>th</sup>, 18th and 19<sup>th</sup> sanctions packages

Over the course of 2025, the EU has adopted four further packages of sanctions. The EU has also released money to Ukraine generated from the proceeds of frozen Russian assets through its windfall mechanism.<sup>89</sup>

Like the UK, the EU's sanctions have been wide ranging. They have continued to target strategic sectors of Russia's economy including Russia's defence industry, Russia's banking sector, international finance and procurement networks, Russia's shadow fleet, those supporting and facilitating Russia's invasion of Ukraine and the occupation of the annexed territories and those enabling sanctions evasion, including in third countries. Addressing disinformation and Russian propaganda has also been identified as a priority.

Further detail is available in:

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<sup>89</sup> Council of the European Union, [Press release](#), 18 July 2025; [Press release](#), 17 May 2025; [Press release](#), 24 February 2025; [EU sanctions against Russia](#) and European Commission, [Daily News](#), 11 August 2025

- Council of the European Union, [16<sup>th</sup> package of sanctions on Russia's war of aggression against Ukraine](#), 24 February 2025
- Council of the European Union, [17<sup>th</sup> package of sanctions on Russia's war of aggression against Ukraine](#), 20 May 2025. This package of sanctions was part of a set of broader EU measures targeting Russian hybrid activities and human rights violations (See Annex 1: Broader Russian sanctions). EU High Representative, Kaja Kallas, described it as the “most wide sweeping since the start of the war” in 2022.<sup>90</sup>
- Council of the European Union, [18<sup>th</sup> package of sanctions on Russia's war of aggression against Ukraine](#), 18 July 2025. Within this package was the EU's announcement that it would, in conjunction with the UK, lower the Oil Price Cap (see above), along with a full transaction ban involving the Nord Stream 1 and Nord Stream 2 gas pipelines (to prevent their completion and future use) and an import ban (effective in January 2026) on refined petroleum products made from Russian-origin crude oil and entering the EU via third countries (with the exception of the UK, US, Canada, Switzerland and Norway, who are all regarded to have already imposed restrictive measures on Russian oil imports that are equivalent to EU import restrictions).<sup>91</sup>
- Council of the European Union, [19<sup>th</sup> package of sanctions](#), 23 October 2025. Further measures targeting Russia's energy, financial and military industrial sectors were announced, including sanctions against the facilitators of Russia's energy sector in third countries such as China. A ban on the import of Liquefied natural gas (LNG) will start in January 2027, although a transition period for existing contracts will be in place until January 2028.<sup>92</sup> The EU also announced that it would strengthen controls over the movement of Russian diplomats within the EU and take further measures against those responsible for the abduction and re-education of Ukrainian children. The EU also imposed further measures on Belarus.

As of February 2026, the EU has sanctioned over 2,700 individuals and entities responsible for actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, including by enabling sanctions evasion.<sup>93</sup> The EU has also sanctioned 597 shadow fleet vessels.<sup>94</sup>

Any proposal to lift EU sanctions [as part of a peace agreement in Ukraine](#) would require the approval of the EU and other sanctioning states.

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<sup>90</sup> Council of the European Union, [Press release](#), 20 May 2025

<sup>91</sup> For more information on the Nord Stream pipelines see Commons Library briefings, Sanctions against Russia (February 2022 to January 2025) and [Geopolitical implications of Nord Stream 2](#), March 2022.

<sup>92</sup> See also Council of the European Union, [Press release](#), 20 October 2025

<sup>93</sup> Council of the European Union, [EU sanctions against Russia](#) (accessed 26 February 2026)

<sup>94</sup> European Commission, [Statement by President Von der Leyen on the 20<sup>th</sup> package of sanctions against Russia](#), 6 February 2026

## Consideration of a 20<sup>th</sup> sanctions package

The EU is considering its next (20<sup>th</sup>) package of sanctions against Russia.

In a statement in early February 2026, EU Commission President Ursula von der Leyen said that “Russia will only come to the table with genuine intent if it is pressured to do so”. As such, the EU’s next package of sanctions will address energy, financial services and trade. Specifically, the measures are expected to include:

- a full maritime services ban on Russian crude oil
- further restrictions on Russia’s shadow fleet and its enablers, including a ban on the provision of maintenance and other services for LNG tankers and icebreakers
- measures to constrain Russia’s banking sector, including its ability to create alternative payment channels. A further 20 Russian regional banks will be designated and measures taken against cryptocurrencies and platforms and companies enabling their trade. Several banks in third countries will also be targeted for their involvement in facilitating the trade in sanctioned goods.
- New export restrictions on goods and services, including those used on the battlefield, such as materials to produce explosives and new import bans on metals, chemicals and critical minerals that are not yet under sanctions. The EU is proposing a cap on ammonia imports.
- The EU’s anti-circumvention tool will be activated for the first time by prohibiting the export of computer equipment and radios to jurisdictions where there is a high risk of re-export to Russia.<sup>95</sup>

The hope was for the 20<sup>th</sup> sanctions package to be agreed at the end of February 2026, and to coincide with the fourth anniversary of the Russian invasion of Ukraine. However, the latest sanctions package was not formally agreed after Hungary reportedly blocked the measures. Hungarian Prime Minister Viktor Orban has also vetoed the EU’s [€90 billion loan to Ukraine that was agreed in December 2025](#) (PDF) after accusing Ukraine of imposing an oil blockade on Hungary by deliberately delaying the repair of [the Druzhba pipeline](#) which was damaged in January 2026 and is the main route for delivering Russian oil to Hungary and Slovakia.<sup>96</sup>

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<sup>95</sup> European Commission, [Statement by President Von der Leyen on the 20<sup>th</sup> package of sanctions against Russia](#), 6 February 2026

<sup>96</sup> See BBC News, [“Orban steps up oil accusations against Ukraine after vetoing EU loan to Ukraine”](#), 26 February 2026 and Euractiv, [“Interview: Hungary holding 20<sup>th</sup> sanctions package ‘hostage’ says top Zelensky adviser”](#), 25 February 2026

## Ending EU reliance on Russian oil and gas imports by 2027

One of the EU's initial responses to the Russian invasion of Ukraine in February 2022 was to announce a plan for phasing out Russian fossil fuel imports by improving sustainability in, and diversifying, the EU's energy supplies. Under the REPowerEU plan, the initial intention was to end the EU's dependency on Russian energy by 2030.<sup>97</sup>

Import bans on Russian oil, petroleum products, coal and liquefied petroleum gas (LPG) have subsequently been introduced. As outlined above, a ban on the import of refined petroleum products from third countries, made with Russian-origin oil, took effect in January 2026.

To date, there is no outright prohibition on the import of Russian pipeline gas or liquefied natural gas (LNG) into the EU, except where LNG is due to be re-exported to non-EU countries through EU facilities. As a result, the EU remains the largest global importer of Russian pipeline gas and LNG.<sup>98</sup> Temporary exceptions to existing import prohibitions have also been extended to several countries, including [Hungary](#) and Slovakia, which rely on Russian supplies of oil and gas and have no viable alternative options.<sup>99</sup>

### REPowerEU Roadmap: May 2025

As a result of increased Russian gas imports into the EU in 2024, in May 2025 the European Commission presented [a roadmap for achieving a total end to the EU's dependence on Russian energy](#). Under that plan, imports of Russian oil and gas will be stopped, and Russian nuclear energy will be phased out, by 1 January 2028.<sup>100</sup>

Individual EU member states are expected to present national plans for phasing out Russian energy dependence by the beginning of March 2026.<sup>101</sup>

In June 2025, the European Commission presented [legislative proposals for phasing out Russian gas imports](#). A regulation phasing out Russian imports of pipeline gas and LNG was subsequently adopted in January 2026.<sup>102</sup> Under that regulation, a full ban will take effect for LNG imports from the beginning of 2027 and for pipeline gas imports from autumn 2027.

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<sup>97</sup> European Commission, [Press release](#), 8 March 2022

<sup>98</sup> Centre for Research on Energy and Clean Air, [September 2025 – Monthly analysis of Russian fossil fuel exports and sanctions](#), 14 October 2025

<sup>99</sup> Council of the European Union, [Press release](#), 3 June 2022

<sup>100</sup> European Commission, [Press release](#), 6 May 2025

<sup>101</sup> European Commission, [Questions and answers on the REPowerEU proposal](#), 17 June 2025

<sup>102</sup> Council of the European Union, [Press release](#), 26 January 2026. The regulation was agreed by qualified majority voting, to avoid being vetoed by any one member states. Hungary, Slovakia and Austria were reported to be opposed to the plans (European Commission, [Press release](#) and [news article](#), 17 June 2025 and The Guardian, [“Europe will never return to Russian gas, European Commission insists”](#), 17 June 2025)

Legislation to phase out Russian oil imports is reportedly expected in April 2026.<sup>103</sup>

There have also been calls for the EU's dependence on Russian energy to be phased out earlier than the end of 2027.<sup>104</sup> As outlined above ([Overview: What has changed in 2025?](#)), in mid-September 2025, President Trump said that the US was ready to impose significant sanctions on Russia when NATO member states (of which 23 are EU members, including [Hungary](#) and Slovakia) stop importing Russian oil.<sup>105</sup> In an interview with ABC News on 7 September 2025, President Zelenskyy also said that countries had to stop purchasing “any kind of energy from Russia, and by the way, anything, any deals with Russia. We can't have any deals if we want to stop them”.<sup>106</sup> He also said that the US should place more pressure on Russia.<sup>107</sup>

Questions have also been raised about the viability and long-term security of replacing Russian oil and gas with supplies from the US, with some arguing that this is an opportunity for the EU to become totally energy independent instead.<sup>108</sup>

## Debate on the seizure of Russian state-owned assets

Discussions within the EU over the seizure of frozen Russian assets also continues, although little practical progress has been made.

Several countries, including the Baltics and many eastern European countries) advocate for the outright seizure of Russia's state assets within the EU. However, others, including Belgium (which is where most of the frozen Russian assets are held by the securities depository Euroclear) continue to express concerns over the effect on the international financial system, the legal precedent that it would set, and the potential liability to legal challenges by Russia.<sup>109</sup> The French Government has suggested using the assets as leverage in any peace agreement negotiations.<sup>110</sup>

In March 2025, the [European Parliament debated the issue of asset seizure](#). In his opening statement, European Commissioner Christophe Hansen said that the EU Commission was open to discussing any “legally and financially sound options to continue pressuring Russia to stop its war of aggression” but at this stage, the Commission's priority “is to operationalise the G7 ERA

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<sup>103</sup> Reuters, “[EU to propose permanent ban on Russian oil after Hungary election, document shows](#)”, 24 February 2026

<sup>104</sup> See for example, [HC Deb 1 September 2025](#), c95

<sup>105</sup> Donald J Trump, [@realDonaldTrump](#), Truth Social, 13 September 2025 (accessed 16 September 2025)

<sup>106</sup> ABC News, [Interview with President Zelenskyy](#), 7 September 2025

<sup>107</sup> As above

<sup>108</sup> See for example, European Environmental Bureau, “[The EU's roadmap to ending Russian energy imports is well-intentioned but replacing Russian gas with US gas is senseless](#)”, 6 May 2025

<sup>109</sup> Belgium has [an investment treaty with Russia](#) which provides for international arbitration in the event of a dispute between the parties. See Euronews, “[What is the reparations loan for Ukraine and why is the EU stuck with the plan?](#)”, 25 October 2025

<sup>110</sup> Euronews, “[European Parliament mulls seizure of Russian assets to help Ukraine](#)”, 12 March 2025

[[Extraordinary Revenue Acceleration](#)] loans and to make available funding to Ukraine”.<sup>111</sup>

### €140 billion reparations loan

In September 2025, the European Commission President, Ursula von der Leyen, proposed establishing a €140 billion ‘reparations loan’ to Ukraine using immobilised Russian assets held by Euroclear. The assets, initially held as bonds, have matured into a cash pool reported to be worth around €175 billion.<sup>112</sup>

Under the proposed mechanism, that money would be transferred to the European Commission, which would then issue a €140 billion loan to Ukraine. The remainder will be used to pay back the pre-existing ERA loan to Ukraine (see above). Ukraine will repay the loan only after Russia ends the war in Ukraine and agrees to compensate for the damages caused. The European Commission believes that a loan would fall short of seizing Russian assets because Russia, in theory, would be able to recover the assets if it agreed to pay reparations.<sup>113</sup> Several governments, including Germany and Lithuania suggested that the loan should be used to purchase military equipment for Ukraine.<sup>114</sup>

European leaders discussed the proposal at a [European Council summit](#) at the end of October 2025, although [no agreement was reached](#). EU leaders agreed to return to the issue at their next meeting on 18-19 December 2025.<sup>115</sup>

However, the December European Council summit also failed to reach an agreement on any reparations loan. Instead, EU leaders agreed to provide Ukraine with a €90 billion loan for 2026-2027, and backed by the EU budget, to ensure “necessary financial support”, including meeting Ukraine’s “military needs”.<sup>116</sup> Hungary, Slovakia and the Czech Republic secured an exemption from the loan agreement, which could, in theory, be repaid using frozen Russian assets subject to further agreement by the EU member states.<sup>117</sup> Work on the longer term use of frozen Russian assets to assist Ukraine is ongoing.<sup>118</sup>

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<sup>111</sup> European Parliament, [Verbatim report of proceedings](#), 12 March 2025

<sup>112</sup> Euronews, [“What is the reparations loan for Ukraine and why is the EU stuck with the plan?”](#), 25 October 2025

<sup>113</sup> As above

<sup>114</sup> The Financial Times, [“Germany’s Merz backs using frozen Russian assets for Ukraine”](#), 25 September 2025

<sup>115</sup> European Council, [Remarks by President Antonio Costa](#), 24 October 2025

<sup>116</sup> European Council, [European Council Meeting – Ukraine](#) (PDF), 18 December 2025

<sup>117</sup> Politico, [“EU agrees to €90B loan – but VDL and Merz suffer defeat as assets plan fails”](#), 19 December 2025

<sup>118</sup> European Council, [Remarks by President António Costa](#), 19 December 2025

### 3 Other partners and allies

The UK and EU have worked with Ukraine's partners and allies to coordinate on sanctions to achieve maximum effectiveness.

Sanctions imposed to the end of January 2025 are examined in the Commons Library research briefing [Sanctions against Russia \(February 2022 to January 2025\)](#).

For information on sanctions announced by some of Ukraine's main partners over the course of 2025 and 2026, the following sources are useful:

#### Canada and Japan – members of the G7

- Government of Canada, [Sanctions – Russian invasion of Ukraine](#)
- Government of Canada, [Consolidated Canadian Autonomous Sanctions List](#)
- Ministry of Economy, Trade and Industry, [Sanctions against Russia and other countries](#)

#### Australia

- Australian Government, Department of Foreign Affairs and Trade, [Russia's invasion of Ukraine](#)
- Australian Government, Department of Foreign Affairs and Trade, [Russia sanctions framework](#)

#### New Zealand

- New Zealand Foreign Affairs and Trade, [Russia sanctions](#)
- New Zealand Foreign Affairs and Trade, [Overview of sanctions against Russia](#)

## 3

## Annex 1: Broader Russian sanctions

Sanctions against Russian nationals and entities have also been imposed over the last decade in relation to human rights abuses in Russia, corruption, chemical weapon attacks and in response to Russian hybrid activity, or those activities below the threshold of conflict such as cyberattacks, sabotage, and the spreading of disinformation (often referred to as activities in the ‘grey zone’).

In 2025, sanctions have been increasingly used by the EU and the UK to address the Russian hybrid threat and what the then head of the CIA, Bill Burns, and the head of MI6, Sir Richard Moore, said in September 2024 was a “reckless campaign of sabotage across Europe”.<sup>119</sup>

## 3.1

### UK sanctions frameworks targeting Russia

In the UK, Russian nationals, state organisations and companies have been targeted under several sanctions’ regimes:

- **Russia:** this is the framework through which the majority of Ukraine-related sanctions following the Russian invasion have been made, and is the focus of this briefing. The regime has also been used to target actors behind Russian state-sponsored hostile activity in the UK. In December 2025 the UK designated the Russian Intelligence Agency, the GRU, in its entirety for its role in the Salisbury poisonings in 2018.<sup>120</sup>
- **Chemical weapons:** used in response to the attacks in Salisbury in 2018 and the Novichok attack on Russian opposition figure Alexei Navalny in 2020. In October 2024 and July 2025, the UK used this regime to sanction several military figures and a Russian research institute, over the transport and use of chemical weapons on the battlefield in Ukraine.<sup>121</sup>
- **Cyber:** used in 2015 and 2018 to sanction several Russian military intelligence officers and units of the GRU (the main intelligence directorate of the Russian armed forces) for attacks on the German Parliament and the Organisation for the Prohibition of Chemical

<sup>119</sup> [FT Live: CIA Director Bill Burns and MI6 Chief Sir Richard Moore talk to FT editor Roula Khalaf](#), 7 September 2024. See also Central Intelligence Agency, [Opinion Piece: Intelligence partnership helps the US and UK stay ahead in an uncertain world](#), 7 September 2024 and Council of the European Union, [Hybrid threats/ Russia: Statement by the High Representative](#), 18 July 2025

<sup>120</sup> See for example, Foreign, Commonwealth and Development Office, [Press release](#), 4 December 2025

<sup>121</sup> Foreign, Commonwealth and Development Office, [Press release](#), 8 October 2024 and HM Treasury, [Financial Sanctions Notice](#) (PDF), 7 July 2025

Weapons. Since 2022, the regime has been used to increasingly target Russian hackers and cybercrime networks, including those with links to Russian military intelligence.<sup>122</sup> In July 2025 the UK also sanctioned a series of individuals and units of the GRU for cyber operations targeting Ukraine both prior to, and since, the Russian invasion.<sup>123</sup> Many of those sanctions have been coordinated with the United States.

- [Global Human Rights](#): also referred to as Magnitsky sanctions. In February 2024, the UK imposed sanctions in relation to the death of Alexei Navalny under this regime.<sup>124</sup> Sanctions were also imposed in April 2023 in relation to the poisoning, arrest and imprisonment of politician and journalist Vladimir Kara-Murza, who is a dual UK-Russian citizen.<sup>125</sup>
- [Global anti-corruption](#): used in 2021 to sanction Russian officials for their role in the serious corruption uncovered by Sergei Magnitsky. In April 2025, the UK sanctioned a pro-Russian network under this regime which was acting to destabilise Moldova.<sup>126</sup>

## 4 Further reading

The following Commons Library research briefings examine sanctions against Russia, both within the context of Ukraine and more broadly, and efforts to counter Russian influence in the UK:

- [Countering Russian influence in the UK](#), March 2025
- [Sanctions against Russia \(February 2022 to January 2025\)](#), January 2025
- [Russian sanctions prior to the invasion of Ukraine](#), May 2023

An examination of the UK's sanctions framework more broadly is also available in Commons Library research briefing, [The UK Sanctions Framework](#).

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<sup>122</sup> The full list of Treasury Notices is available at: HM Treasury, [Cyber financial sanctions: List of asset freeze targets](#). See also Foreign, Commonwealth and Development Office, [Press release](#), 7 May 2024; [Press release](#), 1 October 2024; [Press release](#), 11 February 2025 and [Press release](#), 19 November 2025

<sup>123</sup> Foreign, Commonwealth and Development Office, [Factsheet: GRU cyber and hybrid threat operations](#), 18 July 2025

<sup>124</sup> Foreign, Commonwealth and Development Office, [Press release](#), 21 February 2024

<sup>125</sup> Foreign, Commonwealth and Development Office, [Press release](#), 21 April 2023

<sup>126</sup> Foreign, Commonwealth and Development Office, [Press release](#), 2 April 2025

## 3.2

### New EU sanctions frameworks

In 2024, the EU approved two new sanctions frameworks specifically focused on Russia, and which sit alongside the EU framework designed to address Russian military aggression in Ukraine:

- [A country-specific human rights regime](#), May 2024. It sits alongside [the EU's global human rights sanctions regime](#) and allows the EU to specifically target those who “provide financial, technical, or material support for, or are otherwise involved in or associated with people and entities committing human rights violations in Russia”. It also introduces trade restrictions on exporting equipment which might be used for internal repression and equipment, technology or software intended for use in information security and the monitoring or interception of telecommunications.<sup>127</sup>
- A regime to address hybrid threats from Russia, October 2024. The framework allows the EU to target those engaged in the actions and policies of the Russian Government which “undermine the fundamental values of the EU and its member states, their security, independence and integrity, as well as those of international organisations and non-EU countries”. The scope of the regime was extended in May 2025 to allow for the designation of tangible assets linked to Russia’s destabilising activities, including financial transactions.<sup>128</sup>

Both frameworks have been used extensively over the course of 2025 and in early 2026.<sup>129</sup> Among other things, the most recent sanctions in January 2026 have targeted those engaged in foreign manipulation and interference in relation to the conflict in Ukraine.<sup>130</sup>

In May 2025, sanctions were also imposed under [the EU's chemical weapons regime](#) for the alleged use of chemical weapons on the frontline in Ukraine.<sup>131</sup>

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<sup>127</sup> Council of the European Union, [EU Sanctions against Russia](#)

<sup>128</sup> As above

<sup>129</sup> Council of the European Union, [Press release](#), 16 December 2024; [Press release](#), 20 May 2025; [Press release](#), 20 May 2025; [Press release](#), 15 July 2025; [Press release](#), 15 July 2025; [Press release](#), 5 September 2025; [Press release](#), 15 December 2025; [Press release](#), 22 December 2025; [Press release](#), 29 January 2026; [Press release](#), 23 February 2026

<sup>130</sup> Council of the European Union, [Press release](#), 29 January 2026

<sup>131</sup> Council of the European Union, [Press release](#), 20 May 2025

## 4

## Annex 2: Suggested reading

Commons Library research on the Ukraine conflict, including briefings on the legality of seizing sanctioned Russian assets, and sanctions application in the UK's Overseas Territories is available at: [Collection: The Conflict in Ukraine](#).

See also:

- Business and Trade Sub-Committee on Economic Security, Arms and Export Controls, [Oral evidence session with Trade Minister Chris Bryant](#), 26 February 2026
- Center for Strategic and International Studies, [Russia-Ukraine war in 10 charts](#), 24 February 2026. Chart one provides a snapshot of the Russian economy and the prospects for its long-term productivity in the face of sanctions.
- Centre for Research on Energy and Clean Air, [January 2026 – Monthly analysis of Russian fossil fuel exports and sanctions](#), 18 February 2026
- The Economist, [“How big is the prize of reopening Russia?”](#), 17 February 2026
- European Policy Centre, [“EU should move Russian account out of Belgium to gain strategic options”](#), 16 February 2026
- Friends of Europe, [“Europe’s Plan C: Unlocking frozen Russian assets to fund Ukraine”](#), 13 February 2026
- Committee for Freedom in Hong Kong Foundation, [Bypassing the blockade: How Hong Kong feeds European technology into Russia’s war in Ukraine](#) (PDF), February 2026
- The Guardian, [“Russia working to circumvent sanctions to ensure India oil imports continue”](#), 13 January 2026
- Politico, [“Russia’s arms-makers thrive despite sanctions, new report says”](#), 30 November 2025
- BBC News, [“On the frontline of Europe’s standoff with Russia’s sanctions-busting shadow fleet”](#), 19 November 2025
- Foreign Policy, [“Trump’s Russia sanctions are really putting the hurt on”](#), 11 November 2025
- The Financial Times, [“US sanctions on Russia will not work unless Trump steps up enforcement”](#), 10 November 2025

- Carnegie Politika, [“Will Trump’s sanctions make a dent in Russia’s oil exports?”](#), 28 October 2025
- Timothy Ash, [The ‘fortress Russia’ economy has adapted well to pressure. But stagflation offers an opportunity for the West](#), Chatham House Expert Comment, 5 September 2025
- Chatham House, [Tightening the oil price cap to increase the pressure on Russia](#), September 2025
- The Times, [“How Europe can hit Russia where it hurts – and why it probably won’t”](#), 12 August 2025
- BBC News, [“On Ukraine’s front line, twisted wreckage shows sanctions haven’t yet stopped Russia”](#), 6 August 2025
- Chatham House, [Understanding and improving sanctions today](#), 14 July 2025
- International Crisis Group, [A frozen conflict: The dilemmas of seizing Russia’s money for Ukraine](#), June 2025
- BBC News, [“How the West is helping Russia to fund its war on Ukraine”](#), 30 May 2025

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