

PACKAGE NUMBER 19 OF SANCTIONS AGAINST RUSSIA

Following the recent escalation of aggression against Ukraine, **the Council of the European Union (hereinafter referred to as the EU), on 23 October 2025, published the 19th package of sanctions against Russia and Belarus.**

The new package significantly reinforces existing restrictive measures, focusing its scope on the energy and financial sectors - including cryptocurrency providers - as well as entities and individuals located in third countries.

Likewise, sanctions are once again tightened in the main sectors that constitute the economic sources that sustain the Russian war effort in Ukraine. In particular, these are the energy, financial, military and commercial fields, with additional strengthening of controls on diplomatic activities on the territory of the Union.

On the other hand, the list of natural persons, financial institutions and companies affected by the prohibitions or sanctions contained in the recently published Regulations and Decisions of the Council of the EU is expanded.

The main sanctions by sector are detailed below, with special emphasis on their impact on foreign trade, the export of military equipment and restrictions on dual-use products and technologies.

ENERGY SECTOR

This package introduces a **total ban on the import of liquefied natural gas (LNG)** into the territory of the Union. In addition, the EU extends the framework of restrictions applicable to Russian oil manufacturers, such as **Rosneft, Gazprom, Neft, and also adds Tatarstani to the list.**

These sanctions also affect **Chinese, Emirati and other entities** that carry out activities in support of the Russian military effort, as well as maritime registries that issue false flags to vessels belonging to the so-called "*Russian shadow fleet*".

An additional 117 vessels are added to the list, bringing the total number of vessels sanctioned to 557. In addition, a prohibition is introduced **on re-insuring vessels belonging to the shadow fleet in** order to limit their operations and hinder the transport of sanctioned hydrocarbons.

FINANCIAL SECTOR

In this area, for the first time, specific sanctions are adopted against the use of **cryptocurrencies**, in particular, against the *stablecoin A7A5*, backed by the Russian ruble, and against the associated platform, due to its use to evade international sanctions.

PACKAGE NUMBER 19 OF SANCTIONS AGAINST RUSSIA

A buying and selling platform based in Paraguay has also been identified, which is also included in the sanctioning regime. In doing so, the EU seeks to close all possible legal loopholes that could allow covert financing of Russian operations.

European operators are also **prohibited from providing cryptocurrency or financial services that could facilitate the creation of parallel financial infrastructures** in Russia and thereby circumvent sanctions.

On the other hand, **European operators will not be able to carry out any transactions, direct or indirect, with Russian banks, and eight entities and oil operators from** Tajikistan, Kyrgyzstan, the United Arab Emirates and Hong Kong are sanctioned for their links to sanctions circumvention activities.

This sector also includes the prohibition of transactions **through the Russian National Payment Card System (MIR) and the Rapid Payment System (SBP), as well as with financial institutions that use the Russian payment system (SPFS).**

Finally, economic relations with **entities operating in nine special economic zones on** Russian territory, in which activities linked to the production or development of military equipment are carried out, are restricted.

COMMERCIAL SECTOR

The list of **sanctioned entities** is expanded by 45 new additions, all of them **directly related to logistical, technological or financial support for the war** in Ukraine.

The focus is on **exports** of computerized numerical control (CNC) machinery, microelectronics, components for unmanned aerial vehicles and other dual-use goods, which will be subject to stricter export restrictions and customs control.

Likewise, new limitations are implemented on the **export** of electronic components, rangefinders, chemical products used for propulsion, metals and alloys used in military systems, among others.

The EU also extends the **export ban** to a broader list of products, including salts, minerals, rubber, tyres, cameras and construction materials. According to the Council, in 2024 these exports reached a value of 155 million euros.

As a notable novelty, **the purchase, transfer or import of acyclic hydrocarbons is prohibited**, due to their high strategic relevance to the Russian economy.

PACKAGE NUMBER 19 OF SANCTIONS AGAINST RUSSIA

MILITARY SECTOR

This package incorporates sanctions targeting businessmen and entities that support the Russian military-industrial complex, as well as operators established in third countries, in particular the United Arab Emirates and China, for the supply of goods, military materials and dual-use goods to Russia.

SERVICES

The sanctions extend their scope to **services related to artificial intelligence** (hereinafter, AI), **high-performance computing**, **commercial space services** and **tourism services** provided by European economic operators on Russian territory.

BELARUS

In parallel, the new **sanctions against Russia also apply to Belarus**, with the inclusion of five additional measures related to the Belarusian military exercise and the Lukashenko regime.

CONCLUSION

In short, this 19th package of sanctions substantially reinforces economic pressure from Russia and Belarus, focusing on the strategic sectors underpinning the war in Ukraine.

The sanctions on the energy sector are the most severe to date, while the inclusion of the field of cryptocurrencies sets a relevant precedent in international financial control.

The tightening of restrictions on dual-use goods and military equipment seeks to disrupt the supply chains that supply the Russian military-industrial complex, preventing indirect re-export through third countries.

The strengthening of customs, financial and technological controls is evidence of the EU's intention to close sanctions evasion routes, consolidating a comprehensive and stricter sanctioning framework on strategic goods and key sectors of the economy.

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