EU Adopts 21st Russia Sanctions Package

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If you have any questions regarding the matters discussed in this memorandum, please contact the attorneys listed on the last page or call your regular Skadden contact.

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Executive Summary

- **What's new:** On 23 July 2026, the EU adopted its 21st sanctions package against Russia with parallel measures against Belarus. The sanctions became effective on 24 July 2026.
- **Why it matters:** The package tightens restrictive measures across the energy, financial and cryptoasset sectors and reinforces the legal protection of EU operators against Russian court proceedings, with phased deadlines running to 31 March 2028. Certain transfers of Russian-origin LNG under legacy contracts to third countries remain permitted but are now subject to reporting obligations.
- **What to do next:** Companies should consider assessing exposure to the newly restricted sectors, goods, vessels and entities; tracking applicable phased deadlines (24 July 2026 to 31 March 2028); and, if transferring Russian-origin LNG to third countries, preparing for the new quarterly reporting obligation as of August 2026.

On 23 July 2026, the Council of the European Union adopted its 21st package of sanctions against Russia,[1] amending Council Regulation (EU) No 833/2014 (Regulation 833) together with Council Regulation (EU) No 269/2014 (Regulation 269) and Council Decision (CFSP) 2026/1849 amending Decision 2014/512/CFSP.[2] At the same time, the Council adopted parallel sanctions amending the EU's sanctions regime on Belarus.[3]

All of these restrictive measures entered into force on 24 July 2026, the day following their publication in the *Official Journal of the European Union*.

According to the European Council, its restrictive measures are designed to increase pressure on Russia's energy, financial, cryptoasset and trade sectors while strengthening the EU's anti-circumvention measures and the legal protection of EU operators against Russian court proceedings.[4]

[1] This client alert is for informational purposes only and does not constitute legal advice. Complex assessments often have to be made regarding which sanctions regime applies in any given instance, given the multinational touchpoints of many entities and individuals. In that regard, given the complex and dynamic nature of these sanctions regimes, there may be developments not captured in this summary. Additionally, while the summary was accurate when written, it may become inaccurate over time given developments. For all of these reasons, you should consult with a qualified attorney before making any judgments relating to sanctions, as there are potentially severe consequences for failing to adhere fully to sanctions restrictions.

[2] Council Regulation (EU) 2026/1848 of 23 July 2026 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilizing the situation in Ukraine; Council Regulation (EU) 2026/1844 of 23 July 2026 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine; Council Implementing Regulation (EU) 2026/1843 of 23 July 2026 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine; Council Decision (CFSP) 2026/1849 of 23 July 2026 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilizing the situation in Ukraine.

[3] Council Regulation (EU) 2026/1846 of 23 July 2026 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine; Council Implementing Regulation (EU) 2026/1817 of 23 July 2026 implementing Article 8a(1) of Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine; Council Decision (CFSP) 2026/1847 of 23 July 2026 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine; Council Implementing Decision (CFSP) 2026/1816 of 23 July 2026 implementing Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine.

[4] Council of the EU press release from 23 July 2026, 17:42, "21st Package of Sanctions: EU Hits Russian Energy, Financial Services and Crypto Hard."

Notably, the 21st package:

- Introduces a new transaction ban on refineries in Russia and in third countries that process or refine Russian crude oil or petroleum products, or that circumvent EU restrictive measures (new Article 5ae(2a) of Regulation 833).
- Adds 33 credit or financial institutions to the Article 5h of Regulation 833 transaction ban on Russian financial institutions (Annex XIV to Regulation 833), and lists three additional financial entities and 14 cryptoasset service platforms (based in Georgia, Panama, the United Arab Emirates, the Marshall Islands, Kyrgyzstan and Belarus) in Annex XLV to Regulation 833, thereby subjecting them to the EU's transaction ban on listed cryptoasset service providers.
- Introduces a new mechanism to prohibit all transactions with cryptoasset service providers or platforms established in third countries that the Council designates for systematically failing to prevent circumvention (new Article 5bc of Regulation 833).
- Suspends the procedure for amending the oil price cap on Russian crude oil from 24 July 2026 to 14 July 2027, in response to market disruption following the closure of the Strait of Hormuz, subject to an interim review.
- Creates new exemptions from the prohibition on transferring Russian liquefied natural gas (LNG) to third countries. Certain transfers of Russian-origin LNG to third countries under qualifying legacy contracts remain exempt from the LNG ban past the prior 1 January 2027 deadline, subject to annual volume limits and reporting of 2025 transfer volumes as well as quarterly shipment and contract data to national competent authorities.
- Establishes a phased regime for the sale of LNG tanker vessels: From 24 July 2026, EU sellers must immediately notify competent authorities of sales to third countries. A future Council Regulation may prohibit sales to Russia and trigger due diligence and no-resale requirements for sales to other third countries (new Article 3qa of Regulation 833).
- Extends key wind-down and divestment deadlines for EU operators exiting the Russian market to 31 December 2027.
- Lays the legal groundwork for a future EU-wide refusal of visas to serving and former combatants of Russia's armed forces and affiliated proxy groups; the Council must still decide when this ban takes effect.

This alert explores the EU's 21st package and its practical implications in further detail.

Updates and Key Points

Sanctions Targeting Russia's Energy Sector

New transaction ban on refineries. The new Article 5ae(2a) of Regulation 833 bans any transaction, direct or indirect, with refineries listed in new Annex XLVII, Part D. Part D covers refineries in Russia and in third countries that process or refine Russian crude oil, process or blend petroleum products listed in Annex XXV or Russian-origin mineral products, or are used to circumvent EU restrictive measures. The recitals of the 21st package confirm that the ban targets Russia's oil-sale revenues and reaches both access to the listed refineries' facilities and the provision of any services to them.[5]

The Council has so far listed one refinery under this new ban: the Kulevi Oil Refinery in Georgia. Reflecting the sensitivity of listing an operator outside Russia, the prohibition applies to this listing only from 25 January 2027, and the European Commission (Commission) must report to the Council by 25 October 2026 on whether the listing should be maintained. Companies with dealings involving the Kulevi refinery have a window to wind down affected activity but should not assume the delayed application date is permanent — the Commission's review could result in the listing being kept in place.

Oil price cap — suspension of the adjustment mechanism. The newly introduced Article 3n(11a) of Regulation 833 suspends, from 24 July 2026 to 14 July 2027, the procedure for amending the oil price cap on Russian crude oil — including the calculation of the average market price of Russian crude oil over a 22-week period, publication of the related notice and amendment of Annex XXVIII. New Article 7a(2) of Regulation 833 mirrors this, suspending the Commission's corresponding obligation under Article 7a(1)(a) of Regulation 833 over the same period. The Council grounds the suspension in the recent exceptional disturbances in the crude oil and petroleum-product markets — in particular due to the situation caused by the closure of the Strait of Hormuz — making it necessary to keep the cap effective.[6] The suspension is subject to an interim review. The Commission must still calculate a new average market price by 15 January 2027 and report it to the Council, but any decision to amend the cap based on that calculation is discretionary; if the Council does not act, the current cap remains in place. The ordinary adjustment procedure resumes automatically from 15 July 2027. In addition, the 21st package extends the existing

5 Recital 18 of Council Regulation (EU) 2026/1848 of 23 July 2026 amending Regulation 833.

6 Recital 11 of Council Regulation (EU) 2026/1848 of 23 July 2026 amending Regulation 833; Council of the EU press release from 23 July 2026, 17:42, "21st Package of Sanctions: EU Hits Russian Energy, Financial Services and Crypto Hard."

exemption allowing for the transport (including related ancillary services) of crude oil falling under CN code 2709 00 originating in the Sakhalin-2 Project to Japan until 31 March 2028.

Seized oil cargoes and remote EU territories. Two narrow derogations address previous practical issues in the oil regime. **First**, to let member states dispose safely of seized Russian oil, competent authorities may authorize the purchase, import or transfer of crude oil, or of Annex XXV petroleum products that a member state authority has seized or confiscated in national proceedings, together with the related technical, brokering or financing services (new Article 3m(11) of Regulation 833), and their temporary storage or free-zone placement in EU territory pending sale (new Article 3nb(5) of Regulation 833). Throughout, the goods must remain under the authorities' effective control, and the operations must not, directly or indirectly, benefit any Russian person or entity. **Second**, competent authorities may waive the requirement to prove the origin of the crude oil used in petroleum products refined in a third country and supplied to an EU outermost region or associated overseas country or territory — but only where a proven supply-disruption risk exists and no alternative source is viable (Article 3ma of Regulation 833).

LNG tanker vessel sale restrictions — a phased mechanism. The new Article 3qa of Regulation 833 introduces a notification-first, prohibition-later regime for sales of LNG tanker vessels. From 24 July 2026, any sale or transfer of ownership of LNG tanker vessels[7] by an EU national, resident or entity to a third country must be notified immediately to the competent authorities, including the identities of seller and purchaser, the vessel's registration number by the International Maritime Organization (IMO number) and its call sign. The substantive prohibition on sales to Russia or for use in Russia — together with due diligence duties and mandatory no-resale clauses for sales to other third countries — does not yet apply; those obligations take effect only once triggered by a future Council Regulation, following a Council review due by 25 October 2026. In practice, only the notification duty currently binds EU sellers, though where necessary they should build contractual flexibility into pending transactions given the potential prohibition.

LNG terminal services ban. Article 3rb of Regulation 833 is replaced while its prohibition is in essence retained but slightly broadened: From 1 January 2027, it is prohibited to provide, directly or indirectly, LNG terminal services to any natural or legal person, entity or body in Russia, and to maintain contracts concerning prohibited LNG services beyond that date. The replacement broadens the second limb — services to entities more than 50% owned or controlled by a Russian citizen or Russian entity — in two respects: It deletes the requirement that the entity must be established in the EU, and it widens the control test to "controlled directly or indirectly." Providers of LNG terminal services should therefore screen counterparties for majority Russian ownership or direct or indirect Russian control irrespective of their place of establishment, ahead of 1 January 2027.

LNG-related exemptions and a new reporting duty. Alongside the Sakhalin-2 crude oil exemption for transport to Japan (until 31 March 2028; see above), the 21st package creates a parallel exemption — running from 24 July 2026 to the same date — for Sakhalin-2 LNG transported to Japan and the Republic of Korea (Article 3ra(5) of Regulation 833; Annex XXIX, Part B).

Separately, new Article 3ra(6) of Regulation 833 partly reverses the LNG ban introduced by the 19th package in October 2025 (see our 12 November 2025 client alert). That ban — effective 25 April 2026 (and 1 January 2027 for certain long-term contracts) — prohibits EU persons from importing LNG (CN code 2711 11 00) into the EU and, as the Commission's nonbinding guidance confirms, from purchasing or transferring such LNG to any destination, including third countries.[8] Article 3ra(6) of Regulation 833 now exempts a transfer of Russian-origin LNG to a third country, and any related purchase (where both run under contracts concluded before 24 February 2022) longer than one year in duration and unamended since, save for eight limited amendment types (for example, reduced quantities, price or fee cuts, and operational procedure changes). The exemption runs until 25 July 2027 and renews for successive one-year periods unless the Council, on annual review and on a joint proposal from the EU High Representative and the Commission, decides to shorten, extend or terminate it. In any given year it applies only up to the operator's own 2025 volume of LNG transferred under those contracts, irrespective of destination.

The LNG third-party transfer exemption comes paired with two reporting obligations, each running to the competent authority of the concerned member state, which forwards the information to the Commission without undue delay.

First, persons relying on the exemption and transferring Russian-origin LNG to third countries must report their 2025 transfer volumes by 25 August 2026 — the figure that fixes each operator's annual cap.

Second, from 25 August 2026 and every three months thereafter, operators that transfer (or purchase in relation to such a transfer) Russian-origin LNG to third countries must report, per shipment and as available:

[7] LNG tanker vessels falling under CN code ex 8901 20.

[8] Commission FAQ on LNG ban under Article 3ra of Regulation 833, question 2.

- Cargo reference or bill-of-lading number.
- Vessel IMO number, name, flag state and carrier type.
- Loading and unloading dates, ports and terminals.
- Final destination.
- Volume loaded and discharged.
- Contract duration.
- Contract value per cargo and gross revenue per shipment.
- Name of purchaser and ultimate beneficiary.
- Name of seller and shipper.

Member states and the Commission must protect the confidential and classified information so reported.

Shadow Fleet, Vessel Designations and Anti-Circumvention Infrastructure

Expanded vessel designation criteria. The package enlarges the vessel designation criteria in Article 3s(2) of Regulation 833 to capture vessels that themselves provide support services to already-designated "shadow fleet" vessels. Two new grounds for designation cover vessels that provide services — such as bunkering or tug services — to already-designated vessels and vessels that carry out ship-to-ship transfers with designated vessels (new points (h) and (i)). The EU has observed that designated vessels often depend on such services from third-country vessels to keep operating, and this change is intended to remove that workaround.

Vessel and infrastructure listings. Consistent with the expanded criteria, the package adds 41 further vessels to the shadow fleet list in Annex XLII, bringing the total to 673 designated vessels; new designations include tankers circumventing the oil price cap or otherwise supporting Russia's energy sector, vessels transporting military equipment or stolen Ukrainian grain, and vessels newly designated for providing bunkering or tug services to already-listed vessels.

New port and airport listings. Annex XLVII, which lists infrastructure used to circumvent EU restrictive measures, is expanded to add the Russian ports of Olya (for the transfer of unmanned aerial vehicles (UAVs), missiles or related technology in support of Russia's war against Ukraine) and Vysotsk (for the maritime transport of Russian crude oil or petroleum products by vessels engaged in irregular or high-risk shipping practices). Four Russian airports are added on the grounds that they are used to transport defense- and security-sector goods: Sheremetyevo, Ulyanovsk-Vostochny, Rostov-on-Don Platov and Mineralnye Vody.

Financial and Cryptoasset Sector Measures

Financial and cryptoasset transaction bans. The 21st package amends the transaction-ban lists in three separate annexes, each governed by its own prohibition. Under Article 5h of Regulation 833, it adds 33 further Russian credit or financial institutions to Annex XIV from 13 August 2026 — large or regional banks, banks facilitating cross-border payments, banks operating in occupied Ukrainian territory and banks serving Russian military personnel. Under Article 5ac of Regulation 833, it amends the Annex XLIV list, removing an Azerbaijani bank and adding a Kyrgyzstan bank from 13 August 2026. Under Article 5ad of Regulation 833, it adds to Annex XLV further non-EU entities the Council finds keep giving Russia a financial lifeline by connecting to the System for Transfer of Financial Messages (SPFS) of the Central Bank of Russia or by enabling circumvention, including through cryptoasset platforms: 17 credit, financial, payment and cryptoasset-service entities from 13 August 2026, other crypto platforms from 23 August 2026, and, in Part C, five UAE FZE/FZCO trading entities frustrating the oil and shipping restrictions in Articles 3m, 3n and 3s of Regulation 833 from 13 August 2026.

New tool against cryptoasset platforms in listed third countries. The new Article 5bc of Regulation 833 prohibits engaging, directly or indirectly, in any transaction with a cryptoasset service provider, or a platform for exchanging or transferring cryptoassets, established in a third country listed in the new Annex LVII. The Council may list a country only where it finds the country has systematically and persistently failed to prevent the provision of such services, or such platforms, from frustrating Regulation 833 or Regulation 269. The prohibition does not reach transactions by member state nationals who were resident in the listed country before the date the Annex indicates for it. Annex LVII lists no country as adopted (the tool exists but is dormant for now), so operators should monitor Council decisions closely: A listing could take immediate effect for an entire jurisdiction's cryptoasset sector rather than targeting individual platforms one by one.

Expansion of the cryptoasset ownership prohibition. Article 5b(2a) of Regulation 833 already prohibited Russian nationals and Russian residents from owning, controlling or holding governing-body positions in EU-incorporated entities that provide cryptoasset wallet, account or custody services. From 25 August 2026, that prohibition expands to cover EU-incorporated entities providing any cryptoasset service as defined under the EU's Markets in Crypto-Assets Regulation (Regulation (EU) 2023/1114), not just wallet or custody providers.

Wind-down and account-closure derogations. New derogations allow competent authorities to authorize EU, European Economic Area (EEA) or Swiss nationals (and residents) to withdraw funds or close accounts held at newly listed entities in order to terminate their relationships with those entities. The relevant derogations sit in Article 5h(3) of Regulation 833 (for entities newly added to Annex XIV), Article 5ac(8) of Regulation 833 (for entities newly added to Annex XLIV) and Article 5ad(4) of Regulation 833 (for entities newly added to Annex XLV). In each case, the authorization must be requested no later than three months after the relevant entity's date of application, any authorization granted is valid for a maximum of three months and the withdrawn funds must be transferred to an EU-incorporated credit or financial institution (or one owned or controlled by one). None of these derogations permit the provision of financial messaging services to the listed entities.

Trade Measures — Export and Import Restrictions

Dual-use and defense-related export restrictions. Under Regulation 833, the package adds 51 entities to Annex IV. Those entities face tighter restrictions on exports of dual-use and advanced-technology goods. Most are Russian, but the list also includes certain third-country intermediaries from China and Hong Kong, India, Kazakhstan, Kyrgyzstan, Turkey and the UAE) that the EU considers indirectly enable circumvention of the controls on microelectronics, CNC (computer numerical control) machine tools and semiconductor-processing equipment.

The package also expands Annex VII of Regulation 833, the list of export restrictions relating to items that might contribute to Russia's military and technological enhancement. It adds three material entries:

1. **Nickel powder, metal and alloys** (with 50% or more nickel) used for corrosion-resistant jet-engine coatings.
2. **Beryllium powder** (with 50% or more beryllium), used in propellants and high-performance alloys.
3. **Heat-resistant self-adhesive films, tapes and strips** for the aerospace and defense sectors.

A further cluster targets supply chains of UAVs. It covers servomotors above a set torque-to-weight ratio, UAV launch systems and their parts, and UAV ground support equipment. It also covers "flight termination" systems for UAVs and missiles — including their command, encoder and receiver components — together with the related "use" software. And it newly covers counter-UAV radio-frequency equipment — jammers, signal spoofers, takeover systems and software-defined-radio platforms — designed to seize control of, jam or spoof the signals that command UAVs.

The package also amends point (e) of the export-related Article 3k(5a) of Regulation 833 derogation. That derogation permits the export or transfer of listed goods for the personal use of natural persons in Russia and their accompanying family members. Point (e) now covers five CN (combined nomenclature) codes:

- Aluminum household and kitchen articles (7615 10).
- Small electric fans (8414 51).
- Cooker hoods (8414 60).
- Certain bottling, sealing and beverage-aerating machines (8422 30).
- Personal or household scales (8423 10).

These goods may still be exported for personal use, notwithstanding the Article 3k of Regulation 833 export restrictions.

New import restrictions. The 21st sanctions package adds further goods to Annex XXI to Article 3i of Regulation 833 covering goods whose import the EU restricts because they generate significant revenue for Russia. The new entries cover:

- Certain copper, nickel, lead and precious-metal ores and concentrates (CN codes 2603, 2604, 2607 and 2616).
- Zinc oxide and peroxide (2817).
- Chromium oxides and hydroxides (2819).
- Tall oil (3803).
- A wide range of glass and glassware — fifteen headings between 7001 and 7020, spanning cullet, mirrors, laboratory glassware and imitation pearls.
- Unwrought zinc (7901).
- Motor-vehicle bodies, parts and accessories (8707 and 8708).

The restrictions took effect on 24 July 2026. In its press release, the Council estimates that these goods generate more than €60 million in revenue for Russia.[9]

The new Article 3i(3bg) of Regulation 833 grants transitional relief for these goods. Contracts concluded before 24 July 2026 — and ancillary contracts needed to perform them — may be executed until 25 October 2026. The window covers every newly restricted CN code. Companies with existing supply contracts should confirm which codes their contracts touch and clear any affected deliveries before the October deadline.

A separate, Hungary-specific derogation continues in parallel. Until 31 December 2026, Hungary may still purchase or import Russian-origin saturated acyclic hydrocarbons (such as methane, ethane, propane, butane, pentanes and hexanes) under CN code 2901 10 00 for exclusive use in Hungary (Article 3i(3bc) of Regulation 833).

[9] Council of the EU press release from 23 July 2026, 17:42, "21st Package of Sanctions: EU Hits Russian Energy, Financial Services and Crypto Hard."

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Internet Infrastructure Derogation

Articles 2(4)(e) and 2a(4)(e) of Regulation 833 are amended to ensure the continued provision of goods and services needed to maintain internet infrastructure in Russia for the general public, by referring to civilian electronic communications networks that are not the property of, and are not more than 50% owned by, a publicly controlled entity. A related derogation in Article 3k(5g) of Regulation 833 allows competent authorities to authorize the export and transfer of goods under CN codes 8517 62 and 8523 52 for the same civilian networks.

Travel Restrictions: Diplomats and Combatants

The nonbinding recitals to the 21st sanctions package extend the EU's sharing of information with third countries that have adopted similar travel restrictions, regarding possible breaches of the EU's existing travel restrictions on Russian diplomats, consular officers, and administrative, technical or service staff of Russian missions (and their family members).

This is an incremental enforcement-cooperation measure reflected in the recitals to the amending Regulation, rather than a new stand-alone prohibition in Regulation 833. However, the package also lays the legal basis, under the amended Decision 2014/512/CFSP, for a future EU-wide obligation to refuse visas to individuals serving or having served in Russia's armed forces or affiliated paramilitary and proxy groups involved in the war against Ukraine. This confirms member states' political and legal commitment to the measure, but the Council has not yet decided when the ban takes effect.

Tourism and Research-Funding Derogations

Computerized reservation systems excluded from the tourism-services ban. A new derogation in Article 5n(2a) of Regulation 833 excludes the provision of a "computerized reservation system," as defined in Regulation (EC) No 80/2009, from the EU's ban on providing tourism-related services in Russia.

Research-institution funding derogation. A new Article 5t(3a) of Regulation 833 allows competent authorities to authorize the European X-Ray Free-Electron Laser Facility (EuXFEL), the Facility for Antiproton and Ion Research in Europe (FAIR) and the European Synchrotron Radiation Facility (ESRF) to accept financing, donations or other economic support from Russia, notwithstanding the general ban on accepting Russian research funding, where that support is based on international agreements with the Russian government.

Legal Proceedings and Protection of EU Operators

Recovery of damages. The amendments of the 21st package widen the class of third-country claims that trigger an EU person's recovery right under Article 11a(1) of Regulation 833. The right previously reached only claims lodged by the persons in Article 11(1)(a), (b) or (c) of Regulation 833 — *i.e.*, designated persons, other Russian persons and those acting for them. It now also reaches claims lodged by persons referenced in Article 11(1)(d) of Regulation 833: the third-country entities selling, supplying, transferring or exporting goods in breach of the regulation, which the 20th package added to the claims-satisfaction ban. An EU operator may recover the resulting damages, including legal costs, from those claimants or from whoever owns or controls them, provided it has no effective access to remedies in the relevant jurisdiction.

Nonrecognition of Russian court decisions. The amendment substantially broadens Article 11c(1) of Regulation 833. Previously, the rule solely barred a member state from recognizing or enforcing decisions under Article 248.1 or 248.2 of the Russian Arbitration Procedure Code. The new rule reaches significantly further: It now also extends to administrative decisions and decisions given under any other Russian law. It covers any such decision that holds nationals of a member state or any legal person, entity or body incorporated or constituted under the law of a member state, liable in contract, in tort or on any other basis, or that gives effect to any claim, right or alleged obligation against one, expressly including in insolvency, bankruptcy, restructuring or analogous proceedings. The bar applies wherever the decision connects to a contract or transaction affected by the Regulation. Parallel nonrecognition provisions run under the Regulation 269 and Decision 2014/145/CFSP frameworks, likewise adopted through the 21st sanctions package.

Anti-suit and anti-enforcement orders. The replacement of Article 11ca of Regulation 833 adds a new anti-enforcement remedy and widens the existing anti-suit one. Where a Russian-court claimant (a person falling under Article 11(1)(a), (b) or (c) of Regulation 833) sues an EU person over a sanctions-affected contract, the operator could already obtain a member state court order that the claimant not initiate or discontinue those proceedings. The amendment adds a second limb: an order that the claimant not seek to enforce, recognize or rely upon — in any jurisdiction — any decision obtained in those proceedings. It also expands the trigger. The order is now available not only for breach of an exclusive jurisdiction or arbitration clause, but where the Russian proceedings are brought abusively under Article 248.1 or 248.2 of the Arbitration Procedure Code, under any other Russian law, or in frustration of EU measures. The redrafted Article 11ca of Regulation 833 also drops the old requirement that the order "uphold" a jurisdiction or arbitration clause. This means the anti-suit order no longer presupposes a clause to uphold. Failure to observe either order draws financial penalties proportionate to the potential loss, payable to the affected EU person.

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Extension of Divestment and Wind-Down Deadlines

The 21st package pushes the main divestment derogations from their prior 2026 deadlines to 31 December 2027. Each remains available only on a case-by-case authorization, and only where strictly necessary for divestment from Russia or the wind-down of Russian business activities. Four provisions implement the deadline extension:

1. Article 12b of Regulation 833 — the most important in practice — covers the sale, supply, transfer, import or transfer of controlled goods and technology, related intellectual property rights and trade secrets, and specified professional services.
2. Article 11(4) of Regulation 833 covers the satisfaction of claims.
3. Article 5aa(3)(d) of Regulation 833 covers transactions, including sales, needed to wind down a joint venture concluded before 16 March 2022 that involves an entity subject to the transaction ban under Article 5aa of Regulation 833.
4. Article 5aa(3a) of Regulation 833 covers a listed entity's — or its EU subsidiary's — divestment from an EU-established entity.

Listings and Amendments Under the Regulation 269 Framework

Asset-freeze designations. The Council paired the Regulation 833 measures under the 21st package with its largest round of Regulation 269 asset-freeze listings in four years. The new package adds 48 persons and 168 entities to Annex I to Regulation 269 and two further entities to the equivalent Belarusian sanctions regime[10] subjecting them to EU asset freeze measures. Such measures obligate EU persons to freeze any funds and economic resources belonging to, owned, held or controlled by and prohibiting the provision of funds or economic resources, directly or indirectly, to or for the benefit of such persons. The designations track the banking, military-industrial and commodity industries also covered by the sectoral sanctions outlined above. Four sectors carry significant listings.

1. **Banking** dominates, with 94 credit and financial institutions, including the Moscow Exchange.
2. **The oil industry** accounts for 18 entities and one individual, including three Russian refineries, a major Belarusian refinery and an entity set up to sell Belarusian petroleum products in Russia.
3. **The shadow-fleet support ecosystem** adds eight organizations and one individual, among them a crew-manning agency for the first time.
4. **Gold, diamonds and metals** bring seven gold-sector players, a leading Russian diamond company and several mining and metals entities.

The listings also cover **a major cross-border energy supplier**. The individuals listed include eight figures responsible for Russian war propaganda and a general designated for war crimes against Ukrainian prisoners of war. The latter mirrors, under the asset-freeze regime, the prisoner-of-war designations made 10 days earlier under the EU Global Human Rights Sanctions Regime (see below).

Legal-proceedings protections. The 21st package separately amends the substance of Regulation 269, carrying over two of the litigation protections added to Regulation 833: the damages-recovery right (amended Article 11a(1) of Regulation 269) and the nonrecognition rule for Russian court and administrative decisions (new Article 11c of Regulation 269), the latter in the same broadened form as its Regulation 833 counterpart — reaching administrative decisions, decisions under any other Russian law, and liability asserted in insolvency or restructuring.

Designations under other Russia-related regimes. Ten days before the 21st package, on 13 July 2026, the EU designated a further 28 individuals and 10 entities across four separate Russia-related regimes — none of them Regulation 833 or 269. The Council acted under:

- The cyberattacks regime, Regulation (EU) 2019/796 (Implementing Regulation (EU) 2026/1714).
- The regime for Russia's destabilizing activities — the "hybrid threats" regime — Regulation (EU) 2024/2642 (Implementing Regulation (EU) 2026/1710).
- The EU Global Human Rights Sanctions Regime, Regulation (EU) 2020/1998 (Implementing Regulation (EU) 2026/1720), for serious human rights violations against Ukrainian prisoners of war and civilian detainees.
- The Russia-specific human rights regime, Regulation (EU) 2024/1485 (Implementing Regulation (EU) 2026/1708), for abusive surveillance. Each regime imposes its own asset freeze under its base regulation, independent of the 21st package.

Belarus Sanctions

The package also extends parallel restrictions to Belarus, mirroring, *inter alia*, the following Russia measures:

- Import bans on goods generating significant revenue for Belarus.
- Export restrictions tied to Belarus' military-industrial complex.
- Enhanced legal protections against Belarusian court proceedings.

[10] Council Implementing Regulation (EU) 2026/1817 of 23 July 2026 implementing Article 8a(1) of Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine.

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