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Enhancing Sanctions Implementation: Energy, Export Controls and Enforcement

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Summary

→ Sanctions remain one of the pillars of EU policy towards Russia. Over the past 12 months the EU has maintained momentum in its sanctions policy but it must continue to exert pressure on Russia by limiting its revenue mainly from energy exports and by complicating wartime production.

→ Energy measures have tightened, with the U.S. sanctions on Rosneft and Lukoil, a lower dynamic oil price cap and a legally binding EU phase-out of Russian gas and LNG. The 2026 war with Iran gave Russia a temporary oil windfall, but Ukrainian strikes on refineries forced it to halt fuel exports and import gasoline, limiting net revenues.

→ The practical enforcement of the price cap remains weak. A full maritime services ban faces price and political constraints, so a surcharge on Western shipping services and continued although limited physical action against shadow-fleet tankers are the more realistic next steps.

→ At the EU level, enforcement remains decentralised and uneven. Hungary's change of government has at least eased vetoes. New measures are strengthening the framework, including the first country-level anti-circumvention measure against Kyrgyzstan, expansion of the timespan for sanctions renewal, criminalisation of sanctions breaches, and focus on alternative payment networks.

→ Under Andrej Babiš's government, Czechia has kept to its sanctions course against Russia. It no longer imports Russian oil or gas, continues to expand its national sanctions list and maintains an active role in the EU. Criminal enforcement has grown. Although alternatives are being implemented, nuclear fuel and enrichment technology remains the main residual dependence on Russia not only in the Czech republic but in the whole of Europe.

→ Immobilised Russian sovereign assets still fund Ukraine through interest rates profits, but using the principal underlying assets has not been resolved as it will require a solidarity mechanism for Belgium and better protection for decision-makers. Residual EU–Russia trade of €58 billion could be taxed through a proposed Ukraine Support Tariff.

→ China has become the decisive enabler of Russia's war, yet the EU's economic exposure, fear of retaliation and the unanimity rule continue to limit action against Chinese suppliers and banks, as the EU remains somewhat divided on how to approach the PRC. However, the European Commission has increased the speed of its derisking strategy and is attempting to establish a more aligned approach among the EU27, especially over the Chinese support of Russian aggression.

→ To further Czech capability on sanctions, challenges to be addressed include: understaffed investigative and analytical bodies, limitations of the beneficial ownership register, transposition of the EU asset-recovery directive, and gaps in the sanctions implementation act.

Recommendations for the EU institutions, Member States and global partners (UK, other G7 countries and allies):

Overall allied effort

- The EU and the United Kingdom, Japan, Canada, Australia and other sanctions partners should sustain coordinated implementation and enforcement, while seeking renewed US alignment on energy measures.
- The EU and Partners should prioritise closing documented gaps between their regimes that enable circumvention, including differences in relevant designations, implementation practices and enforcement coverage.
- Authorities should improve the timely, secure and legally usable exchange of designation dossiers and investigative information.

Energy: oil, kinetic sanctions and supply shortage

- Support Ukraine's campaign against Russian refining by financing drones, cruise and ideally also ballistic missiles, and by helping with intelligence and targeting.
- Tighten enforcement of export controls on technologies needed to repair Russian refineries.
- Target Russia's new dependence on imported fuel with sanctions that restrict these imports and increase their costs.
- Deliver on REPowerEU and make the phase-out of Russian fossil fuels faster and more effective, especially for LNG.
- Secure non-Russian uranium supply and, above all, conversion and enrichment capacity.
- Work towards a common EU framework restricting imports of Russian nuclear fuel and technologies.

Surcharge and the shadow fleet

- Consider a surcharge or tax on the use of Western maritime services to carry Russian oil, as proposed by CREA.
- Continue and expand physical action against the shadow fleet (insurance checks, flag verification, boarding, detention and seizure) through a coordinated approach that deters Russian escalation.

EU sanctions implementation

- Ensure EU Member States implement and enforce sanctions consistently to reduce enforcement arbitrage.
- Use the Kyrgyzstan anti-circumvention measure as a precedent for other high-risk jurisdictions.
- Consider extending EPPO's competence to sanctions violations and make better use of existing and newly-formed EU agencies.

EU–Russia trade

- Consider the Kiel Institute's Ukraine Support Tariff on residual trade with Russia[1].

[1] Julian Hinz and Moritz Schularick, The Ukraine Support Tariff: How Europe Can Support Ukraine and Weaken Russia, Kiel Institute for the World Economy, Kiel Policy Brief No. 212, June 2026, online: https://www.kielinstitut.de/fileadmin/Dateiverwaltung/IfW-Publications/fis-import/c35aae7f-c30b-4691-b71a-ce10df066171-KPB_212_EN.pdf.

Russian sovereign assets

- Revisit the use of the asset principal for Ukraine's financing, since the proposed MFF Ukraine Reserve remains insufficient.
- Create a European solidarity mechanism with Belgium and Euroclear stakeholders to share future liability risks.
- Protect EU decision-makers involved in sanctions policy from Russian intimidation.

Russian military industrial complex

- Concentrate on the needs and vulnerabilities of the Russian military industrial complex, which lie primarily in the supply of military electronics and Western-made machine engineering.
- Prioritise screening of European and other Western supply chains in this direction.
- Impose stricter bans and export controls at the EU member state level and provide national authorities with stricter guidance and support from the EU level.

China

- Recognise at the level of the EU27 that the PRC poses a threat to the EU and serves as a key strategic enabler of the Russian aggression against Ukraine and the West.
- Continue the EU's derisking and diversification strategy aimed at lowering risks stemming from a potential sanctions retaliation policy, including above all in critical infrastructure, energy and key industrial sectors.
- Invest in China-free supply chains in key military areas, including drone production (so-called *Non-red drones*), to which the Taiwanese might also contribute.
- Sustain investigation and listing of Chinese actors enabling sanctions circumvention.
- Communicate red lines to the PRC in key sectors (e.g. energy) and pursue a step-by-step approach minimising the Chinese involvement in the Russian aggression.

Belarus

- The EU should continue coordinating with the U.S. on their approach to Lukashenka's Belarus and as much as possible search for synergies in their otherwise divergent policy stances.
- The EU should not withdraw from its policy of sanctions and international isolation of Belarus unless there are tangible signs of diverging from the Russian war of aggression and clear manifestation of solidarity with Ukraine.
- On the contrary, the EU should coordinate and consolidate its sanctions approach on both Russia and Belarus, especially in regards to the sectoral sanctions against the military-industrial complex, which largely became an economic safe haven in the Western-Russian confrontation.[2]
- The EU should discourage the U.S. from testing the Belarus approach also in the Russian context as it is a risky and strategically misguided policy that also contradicts the U.S. Congress approach to the Kremlin.
- Czechia should remain among the principled EU members and hold the line of a cautious approach towards the Lukashenka regime.

[2] BELPOL, Милитаризация Беларуси [Militarisation of Belarus], 2026, online: https://belpol.pro/en/militarizacziya-belarusi-doklad-belpol/.

Recommendations for the Czech government and institutions:

Czech energy decoupling and nuclear fuel

- Make removing Rosatom from the nuclear fuel chain a top priority.
- Secure non-Russian uranium supply and, above all, conversion and enrichment capacity together with Western partners.
- Work towards a common EU framework restricting imports of Russian nuclear fuel and technologies.
- Continue bringing sanctions against Rosatom and TVEL, including at the EU level.
- Develop a concrete timetable for a complete replacement of Russian nuclear supplies, and prepare a proposal for specific dates when sanctions against Rosatom may realistically come into effect.

Capacity and implementation

- Continue using the national sanctions law, including against shadow-fleet facilitators and perpetrators of cyberattacks.
- Address low staffing at key analytical and investigative institutions to strengthen enforcement.
- Strengthen controls on re-exports via China and on Czech companies' joint ventures in third countries that still trade with Russia.

Legislation

- Complete transposition of Directive 2024/1260, Pass the Act on the Forfeiture of Assets of Unexplained Origin.

Beneficial Ownership Register

- Pair the new access regime with stronger verification and correction of ownership data.
- Interpret legitimate interest broadly enough to preserve effective scrutiny of sanctions evasion and opaque ownership structures.

Act on the Implementation of International Sanctions

- Amend the Act further to prevent assets from reaching sanctioned persons indirectly, including through companies they own or control.

Introduction

Sanctions[3] against Russia remain an essential policy instrument for constraining Russia's ability to wage its full-scale war against Ukraine and conduct below-threshold or hybrid operations against EU states and citizens, including cyberattacks, sabotage, information warfare, elections interference and assassinations. Sanctions therefore remain one of the key pillars of the EU's war-time-approach policy towards the Kremlin.

They restrict Russia's access to international markets and to goods and technologies needed for its war economy, reduce revenues from energy exports, limit access to the Russian Central Bank's reserves and other state assets, and impose costs on entities and individuals supporting the war against Ukraine.

Over the past 12 months (since our last research on sanctions - see footnote), EU sanctions have increasingly focused on reducing energy revenues, closing circumvention channels, and targeting the financial and technological infrastructure sustaining Russia's war economy.

Under the new government of Andrej Babiš, Czechia has remained on the trajectory of reducing imports of Russian fossil fuels, maintained its sanctions implementation and enforcement structures, and continued to apply sanctions-related legislation and its national sanctions framework. In addition, the government has supported sanctions to address cyber threats, including by supporting EU-level designations targeting individuals and entities responsible for malicious cyber activities.

This publication continues a series[4] of policy papers examining European and Czech sanctions policy. It highlights key developments and trends over the past 12 months and proposes options for further strengthening the sanctions regimes of both the EU and Czechia, and considers how their close partners can work with them to increase the effectiveness of sanctions through collaboration.

[3] EU terminology uses the term Restrictive measures.

[4] Pavel Havlíček, Boris Kaliský and Lukáš Kraus, Možnosti lepší implementace mezinárodních sankcí pro příští českou vládu, Asociace pro mezinárodní otázky, 24. 10. 2025, online: https://www.amo.cz/wp-content/uploads/2025/10/AMO_Sankce-CZ_web-1.pdf.
Lukáš Kraus, Pavel Havlíček, Emma Isabella Sage and Boris Kaliský, Doporučení k posílení implementace protiruských sankcí v Česku, Lobbio, AMO and PSSI, 2024, online: https://www.pssi.cz/wp-content/uploads/2025/07/11333_doporuc-eni-k-posi-leni-implementace-protirusky-ch-sankci-v-c-esku.pdf.

1 Energy

1.1 Oil, kinetic sanctions and supply shortage

Oil and gas exports remain a major source of revenue for the Russian state, but their weight in the budget has fallen sharply, from 42% of federal revenues in 2022[5] to less than 23% in 2025[6], with the Finance Minister expecting below 20% in 2026[7]. The past 12 months brought some positive steps. In October 2025, the U.S. imposed blocking sanctions on Rosneft and Lukoil[8]. Although with a limited effect (see next chapter) the EU and UK applied a dynamic oil price cap[9] of $44.10 per barrel from February 2026, which the EU kept frozen[10] despite the price spike. The EU adopted a legally binding phase-out of Russian gas and LNG[11] (EU Regulation 2026/261) and, from January 2026, banned imports of oil products refined from Russian crude in third countries. Member States also stepped up action against the shadow fleet and its insurers, ports, traders, refineries and service providers.

These gains were partly offset by the U.S.–Israel war with Iran, which began on 28 February 2026 and largely closed the Strait of Hormuz. Russia's oil export revenues nearly doubled in March[12] and in April were $6.3 billion higher than a year earlier[13]. Ukraine's strikes on Russian refineries and export infrastructure limited this windfall. Russia banned gasoline and diesel exports, and by August its product exports had nearly halted[14]. Having lost much of its higher-value exports, Russia now imports fuel, buying over 20 times more gasoline from Belarus[15] in the first half of 2026 at around 60% above domestic wholesale prices, and arranging rare seaborne imports[16].

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[5] Iwona Wiśniewska, Russia's 2026 budget: mounting financial challenges and economic stagnation, OSW Centre for Eastern Studies, 9. 12. 2025, online: https://www.osw.waw.pl/en/publikacje/osw-commentary/2025-12-09/russias-2026-budget-mounting-financial-challenges-and-economic.

[6] Meduza, Russia's oil and gas revenues are shrinking. Meduza explains what that means for the Kremlin's war chest, 28. 1. 2026, online: https://meduza.io/en/feature/2026/01/28/russia-s-oil-and-gas-revenues-are-shrinking-meduza-explains-what-that-means-for-the-kremlin-s-war-chest.

[7] Sergei Shelin, Why High Oil Prices Won't Fix Russia's Budget Crisis, The Moscow Times, 19. 3. 2026, online: https://www.themoscowtimes.com/2026/03/19/why-high-oil-prices-wont-fix-russias-budget-crisis-a92257.

[8] Mike Schuler, U.S. Treasury Sanctions Russia's Largest Oil Companies Over Ukraine, gCaptain, 22. 10. 2025, online: https://gcaptain.com/u-s-treasury-sanctions-russias-largest-oil-companies-over-ukraine/.

[9] European Commission, New dynamic mechanism to lower price cap for Russian crude oil to $44,10 per barrel, 15. 1. 2026, online: https://finance.ec.europa.eu/news/new-dynamic-mechanism-lower-price-cap-russian-crude-oil-4410-barrel-2026-01-15_en.

[10] S&P Global, Putin extends Russian oil ban tied to G7, EU price cap through 2027, 26. 6. 2026, online: https://www.spglobal.com/energy/en/news-research/latest-news/crude-oil/062626-putin-extends-russian-oil-ban-tied-to-g7-eu-price-cap-through-2027.

[11] European Union Agency for the Cooperation of Energy Regulators, ACER report on Russian gas import contracts and diversification, 1. 7. 2026, online: https://www.acer.europa.eu/sites/default/files/documents/Publications/ACER-Report-Russian-gas-imports-2026.pdf.

[12] International Energy Agency, Oil Market Report – April 2026, 14. 4. 2026, online: https://iea.blob.core.windows.net/assets/515f3128-df1a-4d6c-beb4-fd91d2434bef/-14APR2026_OilMarketReport_Free_version1.pdf.

[13] International Energy Agency, Oil Market Report – May 2026, 13. 5. 2026, online: https://iea.blob.core.windows.net/assets/2b89a47b-34a2-40e0-90ff-68f7ccd80715/-13MAY2026__OilMarketReport_publicversion.pdf.

[14] International Energy Agency, Oil Market Report - September 2026, 11. 9. 2026, online: https://www.iea.org/reports/oil-market-report-september-2026.

[15] Roman Kohanets, Russia Boosts Belarus Gasoline Imports 20-Fold to Mitigate Severe Domestic Fuel Crisis, UNITED24 Media, 9. 7. 2026, online: https://united24media.com/world/russia-boosts-belarus-gasoline-imports-20-fold-to-mitigate-severe-domestic-fuel-crisis-20619.

[16] Kyiv Post, Russia Turns to Sea Imports as Drone Strikes Trigger Fuel Shortages, 18. 6. 2026, online: https://www.kyivpost.com/post/78436.

Nevertheless, the most recent pressure by the U.S. on Ukraine asking for an end to the attacks against the fuels processing industry and refineries casts a shadow over the well-working initiative. Especially since it can be clearly perceived as coming from the U.S. domestic prism of fuel prices before the mid-term elections to the U.S. Congress.

The net budget effect has so far been negative for the Kremlin. Federal oil and gas revenues in January–September 2026 were 17.2% lower than a year earlier[17], partly because subsidies to refiners absorb a growing share. Higher prices have nonetheless cushioned the decline and, with other revenues and reserves, will help Russia finance the war at least into next year.

A full reopening of the Strait of Hormuz would bring Gulf oil back to the market and lower prices. With the U.S.–Iran talks at an impasse, however, the EU has little leverage to broker a solution and lacks the military capacity to force the Strait to open.

Another priority is to support Ukraine's campaign against Russian refining by financing drones, cruise missiles and ideally ballistic missiles, and helping with production, intelligence and targeting. The French and subsequently the UK's August 2026 decision to share Storm Shadow/SCALP production technology[18] with Ukraine is a step in the right direction.

The EU and its Member States should also tighten enforcement of export controls on technologies needed to repair Russian refineries. Given Russia's new dependence on imported fuel, new sanctions should aim to restrict these imports and raise their cost. This, in particular, concerns members of the world community with close relations to the West, including South Korea.[19]

Finally, the EU must deliver on its REPowerEU commitment to end dependence on Russian fossil fuels as soon as possible, making the phase-out faster and more effective, especially for Russian LNG.[20]

1.2 Price cap, services ban or surcharge

The EU and G7 countries have long struggled to enforce the price cap. A key weakness is attestation fraud: insurers and shipowners have no direct access to the price paid for the oil and rely on traders' attestations. Inflated freight and other ancillary costs can hide the real price, and most Russian crude is traded by opaque entities in non-coalition jurisdictions such as the UAE and Hong Kong. Meanwhile, frequent sanctioning of shadow vessels has shifted Russian oil back to G7+ tankers[21], which in July 2026 carried 42% of Russia's seaborne oil, and 72% of its oil products.

A stricter option is a full maritime services ban, prohibiting G7, EU and UK companies from transporting, insuring, financing or brokering Russian oil regardless of its price. It would be simpler to enforce, and the EU's 20th sanctions package[22]

[17] Vlad Litnarovych, Russia's Oil Revenue Machine Is Losing Steam—September Income Drops 22%, UNITED24 Media, 5. 10. 2026, online: https://united24media.com/war-in-ukraine/russias-oil-revenue-machine-is-losing-steam-september-income-drops-22-23128.

[18] Tony Osborne, UK Hands Over Storm Shadow/Scalp Data To Enable Ukrainian Domestic Production, Aviation Week, 24. 8. 2026, online: https://aviationweek.com/defense/missile-defense-weapons/uk-hands-over-storm-shadowscalp-data-enable-ukrainian-domestic.

[19] Raphael Rashid, Fuel from South Korea being shipped to Russia as Ukraine war grinds on, The Guardian, 6. 10. 2026, online: https://www.theguardian.com/world/2026/oct/06/oil-tankers-south-korea-russia-ukraine-war.

[20] European Commission, REPowerEU, n.d. (accessed 26. 10. 2026), online: https://commission.europa.eu/topics/energy/repowereu_en.

[21] Luke Wickenden and Isaac Levi, July 2026—Monthly analysis of Russian fossil fuel exports and sanctions, Centre for Research on Energy and Clean Air, 10. 8. 2026 (updated 16. 10. 2026), online: https://energyandcleanair.org/july-2026-monthly-analysis-of-russian-fossil-fuel-exports-and-sanctions/.

[22] Council of the European Union, Russia's war of aggression against Ukraine: 20th round of stern EU sanctions hits energy revenues, military-industrial complex, trade and financial services, including

already provides a legal basis, conditional on agreement with the G7 and Price Cap Coalition partners. The constraints are now considerable. In today's supply-constrained market, a ban risks a price shock. It would also be hard to agree: Greece initially blocked the 21st package[23] to protect its shipping sector. Over time, much of the volume would also shift to the shadow fleet or to ships reflagged as Russian[24].

An alternative, proposed by CREA[25], is a tax or surcharge on the use of Western maritime services to carry Russian oil. This would cut Russian exporters' profits, make Russian oil less attractive and raise revenue for Ukraine.

Even if G7 services exited the trade, Russia would rely on shadow and sanctioned tankers, which carried 53% of its seaborne oil in July 2026[26]. The EU and UK have moved beyond listing tankers more toward physical disruption: insurance checks, flag verification, boarding, detention and, in a few cases, seizure. In July 2026, for example, Italian forces under the EU's Operation IRINI boarded the sanctioned tanker South Star[27] on suspicion of a false flag. These operations are demanding and require a coordinated European approach to deter Russian escalation, but they should be continued and expanded.

1.3 Czech Energy decoupling from Russia

Since Russia's full-scale invasion, Czechia has largely eliminated its dependence on Russian gas and crude oil. For gas, ČEZ, a dominant Czech state-backed power utility, leased capacity at the Eemshaven LNG terminal[28] in the Netherlands, which has handled 92 cargoes for Czechia since 2022, mostly from the U.S. and none from Russia. It also secured 2 bcm per year at the future Stade terminal[29] in Germany. Because Stade is delayed, the government has asked ČEZ to extend its Eemshaven capacity[30] beyond September 2027. Pipeline gas now comes mainly from Norway, and the state took control of the gas transmission system when ČEPS acquired NET4GAS in December 2023[31]. For oil, the TAL-PLUS expansion[32] raised capacity on

crypto, 23. 4. 2026, online: https://www.consilium.europa.eu/en/press/press-releases/2026/04/23/russia-s-war-of-aggression-against-ukraine-20th-round-of-stern-eu-sanctions-hits-energy-military-industrial-complex-trade-and-financial-services-including-crypto/.

[23] Luke Wickenden and Isaac Levi, July 2026—Monthly analysis of Russian fossil fuel exports and sanctions, Centre for Research on Energy and Clean Air, 10. 8. 2026 (updated 16. 10. 2026), online: https://energyandcleanair.org/july-2026-monthly-analysis-of-russian-fossil-fuel-exports-and-sanctions/.

[24] Giulio Tomio, Under the Russian Flag: Reflagging and the Future of Shadow Fleet Enforcement, International Centre for Defence and Security, 15. 7. 2026, online: https://icds.ee/en/under-the-russian-flag-reflagging-and-the-future-of-shadow-fleet-enforcement/.

[25] Wickenden and Levi, *July 2026—Monthly analysis of Russian fossil fuel exports and sanctions*.

[26] Ibid.

[27] The Maritime Executive, EU Inspects Sanctioned Tanker as It Increases Pressure on Shadow Fleet, 22. 7. 2026, online: https://maritime-executive.com/article/eu-inspects-sanctioned-tanker-as-it-increases-pressure-on-shadow-fleet.

[28] ČTK, Eemshaven LNG terminal handled 92 ships for Czechia, delivering 14 months' worth of gas, oEnergetice.cz, 1. 10. 2026, online: https://oenergetice.cz/en/lng/eemshaven-lng-terminal-handled-92-ships-for-czechia-delivering-14-months-worth-of-gas-146756.

[29] ČEZ, The Czech Republic is strengthening its long-term LNG energy security. ČEZ has acquired capacity at the German Stade terminal, 23. 11. 2023, online: https://www.cez.cz/en/media/press-releases/the-czech-republic-is-strengthening-its-long-term-lng-energy-security.-cez-has-acquired-capacity-at-the-german-stade-terminal-184891.

[30] ČTK, ČEZ se přihlásil do tendru o prodloužení kapacit LNG v Eemshavenu pro další roky, oEnergetice.cz, 3. 2. 2026, online: https://oenergetice.cz/lng/cez-se-prihlasil-do-tendru-o-prodlouzeni-kapacit-lng-v-eemshavenu-pro-dalsi-roky.

[31] NET4GAS, ČEPS, a.s., acquired 100% ownership participation in the sole shareholder of NET4GAS, s.r.o, 11. 12. 2023, online: https://www.net4gas.cz/files/opress-releases/ceps-en.pdf.

[32] Government of the Czech Republic, Prime Minister Fiala: The Czech Republic Has Definitively Freed Itself from Dependence on Russian Oil, 17. 4. 2025, online: https://vlada.gov.cz/en/media-centrum/aktualne/prime-minister-fiala-the-czech-republic-has-definitively-freed-itself-from-dependence-on-russian-oil-219417/.

the western TAL/IKL route to 8 million tonnes a year, enough to cover Czech demand without the Druzhba pipeline. Czechia has been supplied exclusively with non-Russian crude since April 2025, with Azerbaijan the main supplier, followed by Norway, Kazakhstan and Saudi Arabia[33]. However, it is necessary to take a close look at Kazakhstan's oil supplies, especially in the future, since there are suspicions of close coordination with the Russian provisions and in practice it is hard to impossible to differentiate the substance from the Russian commodity.

1.4 Nuclear fuel dependence

The remaining significant Russian energy link is nuclear fuel. Here diversification is underway but not complete as this transition is not only a matter of sourcing but requires properly designed fuel and time intensive testing, certification and a gradual introduction into operational use. ČEZ signed contracts with Westinghouse and Framatome for Temelín in 2022 and with Westinghouse for Dukovany in 2023, replacing Russia's TVEL. The first Westinghouse fuel arrived at Temelín in May 2025[34] and at Dukovany in June 2025[35]. The regulator approved the Westinghouse fuel for Temelín[36] only in September 2026, while licensing for Dukovany is still being prepared, so both plants still rely partly on TVEL fuel held in stock. ČEZ also maintains strategic fuel reserves. Dukovany's fuel cycle remains the main residual exposure to Russian supply.

Framatome's position in the European nuclear fuel cycle remains a weakness of the sanctions regime. Framatome is a French state company controlled by EDF, with no Russian ownership, but it cooperates with Rosatom's fuel subsidiary TVEL, especially in the technological area. Under a 2021 licence agreement[37], its German subsidiary ANF plans to manufacture fuel for Russian-designed VVER reactors in Europe using TVEL licences, engineering know-how, machinery and components in the Lingen plant. The resulting fuel is European-made but still partly dependent on Russian technology, which is becoming more and more a point of criticism.[38]

This cooperation is presented as a transitional way to reduce Europe's reliance on importing complete Russian fuel assemblies. It does not yet amount to independence from Russia: Rosatom retains a commercial interest and supplies intellectual property, equipment and Russian-manufactured fuel pellets. On 22 July 2026, Lower Saxony, acting for the federal government, approved the expansion of Framatome's Lingen plant[39] to produce VVER-1000 fuel under the TVEL licence,

[33] CEENERGYNEWS, Czechia moved away from Russian fuels: What can Hungary learn?, ceenergynews.com, n.d. (accessed 26. 10. 2026), online: https://ceenergynews.com/oil-gas/czechia-hungary-russian-fuels/.
[34] World Nuclear News, Westinghouse fuel arrives at Temelin nuclear power plant, 23. 5. 2025, online: https://www.world-nuclear-news.org/articles/first-westinghouse-fuel-arrives-at-temelin-nuclear-power-plant.
[35] World Nuclear News, First Westinghouse nuclear fuel delivered to Dukovany, 17. 6. 2025, online: https://www.world-nuclear-news.org/articles/first-westinghouse-nuclear-fuel-delivered-to-dukovany.
[36] World Nuclear News, Westinghouse fuel approved for Czech Temelín units, 10. 9. 2026, online: https://www.world-nuclear-news.org/articles/westinghouse-fuel-approved-for-czech-temelin-units.
[37] Euronews, Despite sanctions: German company wants to build fuel elements with Putin's nuclear group, 26. 3. 2026, online: https://www.euronews.com/2026/03/26/despite-sanctions-german-company-wants-to-build-fuel-elements-with-putins-nuclear-group.
[38] Reuters, Germany should block plant making parts for Russian reactors, state minister says, 7. 10. 2026, online: https://www.reuters.com/business/energy/germany-should-block-plant-making-parts-russian-reactors-state-minister-says-2026-10-07/.
[39] World Nuclear News, Approval for VVER fuel production in Germany, 24. 7. 2026, online: https://www.world-nuclear-news.org/articles/approval-for-vver-fuel-production-in-germany.

subject to strict conditions[40]. Framatome expects its own sovereign VVER-1000 fuel to be licensed by 2030[41], after which the Rosatom-based line would close. The approval should be monitored with great caution and reconsidered depending on the extent of TVEL/Rosatom involvement. The Framatome project includes the presence of Russian personnel, which also has security implications.

Given the sensitivity of nuclear fuel and the importance of energy generation, continued cooperation with Russian suppliers ultimately enables pressure to be exerted on individual EU Member States and their foreign policy to be influenced. This, together with the continuing dependence on Russian imports, is one of the main reasons why sanctions on imports of Russian nuclear materials were not formally addressed by the European Commission until May 2025, and even then only to a very limited extent. The adoption of a common European framework restricting imports of Russian nuclear fuel and technologies is currently being hampered by differing positions among Member States, especially those with historically close ties to the Russian providers.

Removing Rosatom from the nuclear fuel chain should be a priority, but Czech and EU efforts should also secure non-Russian uranium supply and, above all, conversion and enrichment capacity, where Russia still provides over a fifth of EU enrichment services.[42]

[40] Charles Digges, Germany wants independence from Russian nuclear fuel, using Rosatom as a bridge, Bellona, 17. 9. 2026, online: https://bellona.org/news/nuclear-issues/2026-09-germany-wants-independence-from-russian-nuclear-fuel-using-rosatom-as-a-bridge.

[41] Nuclear Engineering International, Germany approves VVER fuel production, neimagazine.com, n.d. (accessed 26. 10. 2026), online: https://www.neimagazine.com/news/germany-approves-vver-fuel-production/.

[42] As for other nuclear energy projects, Czechia is expanding nuclear power through two new KHNP-built reactors at Dukovany, planned for the late 2030s, and small modular reactors developed with Rolls-Royce SMR, with the first expected at Temelín in the mid-2030s. Two additional reactors at Temelín remain under consideration. South Korea's KEPCO Nuclear Fuel is expected to supply the new Dukovany reactors, while Westinghouse is developing fuel for Rolls-Royce SMRs.

2 The new Czech government and sanctions implementation

Since taking office in December 2025, Andrej Babiš's government has continued to implement and enforce sanctions. Despite the reorganisation of the Ministry of Foreign Affairs, it has kept using the national sanctions law to expand the national list. It added AQAH, a Hezbollah-linked Lebanese non-bank financial institution, and Konstantin Rogač, a Russian insurance broker for shadow-fleet tankers[43], who was later added to the EU sanctions list. Measures against perpetrators of cyberattacks are another important strand of Czech sanctions policy which has been strengthened over this year.[44]

Since the full-scale Russian invasion, Section 410 of the Czech Criminal Code has gone from a nearly dormant provision to the basis for dozens of investigations. By the end of 2023, prosecutors had recorded 14 cases: three involving assets of sanctioned persons and eleven involving trade in sanctioned goods, mainly dual-use items, a civilian aircraft and parts for military aircraft (Prosecution Report 2023[45]). Nine more followed in 2024 (Prosecution Report 2024[46]). The first conviction came in Teplice, where a Russian national was fined CZK 300,000 and banned from selling vehicles for 20 months for attempted sanctions violation (ČTK[47]). In September 2025, the National Centre against Organized Crime (NCOZ) charged six individuals and one company with exporting seven sanctioned mining machines to Russia via third countries (Czech Police[48]). In late summer 2026, it proposed indicting a man for transferring over CZK 96 million belonging to a sanctioned person; about CZK 66 million has been seized (Czech Police[49]). By August 2026, according to the Prague High Prosecutor's Office, eight people and three companies had been charged, two people were on trial and one had been convicted. The office had about 19 cases in pre-trial proceedings, mostly involving dual-use goods and luxury vehicles. Some cases have been dropped, however. In June 2026, police closed a year-long probe into a suspected export of control systems after finding the goods never left the EU[50].

The Security Information Service (BIS) annual report for 2025[51] states that Russia continued to seek sanctioned and export-controlled goods through indirect procurement networks, mostly via re-exports through third countries and multiple intermediaries. Cases involved Czech manufacturers with historical ties to Russia and trading companies controlled by Russian or other post-Soviet nationals. Demand

[43] Ministerstvo zahraničních věcí České republiky, Vnitrostátní sankční seznam, 23. 7. 2026, online: https://mzv.gov.cz/file/6248993/Vnitrostatni_sankcni_seznam_2026_07_23.pdf.
[44] Seznam Zprávy, Státy EU uvalily nové sankce kvůli ruským kybernetickým útokům, n.d. (accessed 26. 10. 2026), online: https://www.seznamzpravy.cz/clanek/zahranicni-francie-si-kvuli-ruskym-kybernetickym-utokum-predvola-velvyslance-310858.
[45] Nejvyšší státní zastupitelství, Zpráva o činnosti státního zastupitelství za rok 2023, 24. 6. 2024, online: https://verejnazaloba.cz/wp-content/uploads/2024/06/Zpr%C3%A1va-o-%C4%8Dinnosti-SZ-za-rok-2023.pdf.
[46] Nejvyšší státní zastupitelství, Zpráva o činnosti za rok 2024, n.d. (accessed 26. 10. 2026), online: https://verejnazaloba.cz/nsz/cinnost-nejvyssiho-statniho-zastupitelstvi/zpravy-o-cinnosti/zprava-o-cinnosti-za-rok-2024/.
[47] ČTK, Za porušení protiruských sankcí uložil soud v Teplicích Rusovi peněžitý trest, České noviny, n.d. (accessed 26. 10. 2026), online: https://www.ceskenoviny.cz/zpravy/za-poruseni-protiruskych-sankci-ulozil-soud-v-teplicich-rusovi-penezity-trest/2509920.
[48] Policie České republiky, Porušení mezinárodních sankcí – obvinění osob, n.d. (accessed 26. 10. 2026), online: https://policie.gov.cz/clanek/poruseni-mezinarodnich-sankci-obvineni-osob.aspx.
[49] Jaroslav Ibehej, Porušení mezinárodních sankcí – návrh na obžalobu 1 osoby, Policie České republiky, n.d. (accessed 26. 10. 2026), online: https://policie.gov.cz/narodni-centrala-proti-organizovanemu-zlocinu-skpv/poruseni-mezinarodnich-sankci---navrh-na-obzalobu-1-osoby.
[50] Odkryto.cz, NCOZ šla po dodávkách číslicových panelů do Ruska, 23. 8. 2026, online: https://www.odkryto.cz/ncoz-sla-po-dodavkach-cislicovych-panelu-do-ruska/.
[51] Security Magazín, Výroční zpráva BIS: Reexporty, sabotáže a Čína – hlavní rizika pro obranný průmysl, 28. 8. 2026, online: https://www.securitymagazin.cz/security/vyrocni-zprava-bis-2025-obranny-prumysl-1404074613.html.

focused on CNC machine tools and spare parts, aircraft components, electronics, bearings, firearms and ammunition, and laboratory equipment potentially relevant to chemical, biochemical and molecular-biology programmes.

China remains a key supplier of components for Russian weapons production, which creates re-export risks for Czech goods sent there. Czech companies' joint ventures in third countries that still trade with Russia pose further risks, including transfers of production technology, technical documentation and know-how.

A continuous problem spanning to the beginning of the Russian war with Ukraine is the low staffing levels at key institutions relevant for sanctions related analytics and investigation, especially the Financial Analytical Office (FAU). This is in contrast to the ever evolving methods of sanctions circumventions and hiding of sanctioned assets which requires very labour intensive investigation.

2.1 Legislation

The Czech Republic transposed Directive (EU) 2024/1226 on criminal offences and penalties for violations of EU restrictive measures through Act No. 270/2025 Coll., a broad reform of criminal law published in August 2025 (i.e. still during the previous government's term), with most provisions, including those on sanctions, in force from 1 January 2026. The Act revised Section 410 of the Criminal Code on violations of international sanctions and added a new Section 410a on certain grossly negligent violations, particularly involving dual-use goods or military material. It also defined "*international sanctions*" more clearly and strengthened the penalties available to courts.

As of 1 October 2026, the Czech Republic has not yet transposed Directive (EU) 2024/1260 on asset recovery and confiscation, though the deadline of 23 November 2026 has not yet passed. The Directive is relevant for sanctions enforcement as it also empowers asset recovery offices to trace and identify property of persons subject to EU restrictive measures, including where needed to prevent, detect or investigate sanctions breaches.

The key measure is a new Act on the Forfeiture of Assets of Unexplained Origin, with an accompanying amendment bill. It implements Article 16 of the Directive through a special in rem procedure allowing courts, under defined conditions, to confiscate property suspected of criminal origin even where it cannot be sufficiently linked to a specific offence or offender. The government approved both bills on 2 February 2026 and submitted them to Parliament on 10 February as Chamber Prints (draft bills) 101 and 102. As of October 2026, they remain at first reading in the Chamber of Deputies. Further changes are needed on asset-recovery and asset-management offices and on tracing and managing seized property, and the Ministry of Justice is preparing amendments to the Criminal Procedure Code and related laws.

2.2 Beneficial Ownership Register

The Czech Beneficial Ownership Register is an important tool against money laundering, corruption, conflicts of interest and sanctions circumvention, but both its data reliability and access remain problematic. A Datlab analysis[52] of 18,585 companies with probable Russian ownership found that only 35.5% had a complete record of a Russian beneficial owner, and 13% had no beneficial owner registered at all. Transparency International[53] Czech Republic has likewise described the register's data as lacking accuracy and timeliness. Legal developments have also restricted public scrutiny. Following the 2022 CJEU judgment in WM and Sovim (joined cases C-37/20 and C-601/20) and subsequent Czech court decisions, public access was suspended on 17 December 2025[54]. In the meantime, the Supreme Court held[55] that the state can not force companies to register through fines until the law is amended. On 22 June 2026, the government approved an amendment[56], now before Parliament, that replaces public access with a legitimate-interest test administered by the Ministry of Justice. Access will generally cover current data, with historical data reserved for specified users, and Justice Minister Jeroným Tejc said the law should take effect in November[57].

The amendment implements the EU's 2024 anti-money-laundering framework (Regulation (EU) 2024/1624 and Directive (EU) 2024/1640), which requires stronger verification of beneficial ownership data while allowing access for persons with a legitimate interest. However, the final Czech proposal is narrower than an earlier draft. References to preventing corruption and conflicts of interest, protecting public assets and ensuring transparent administration were removed on the decision of the Ministry's leadership[58], leaving the justification focused on money laundering and terrorist financing. The bill nevertheless presumes a legitimate interest[59] for journalists, professional chambers, NGOs and academics, with journalists, broadly defined, getting blanket access to the whole register. This should preserve investigative use but may hinder those examining corruption, conflicts of interest or sanctions circumvention without a clear AML link. The government should pair the new regime with stronger verification and correction of ownership data and interpret legitimate interest broadly enough to preserve effective scrutiny of sanctions evasion and opaque ownership structures.

[52] Datlab, Analýza spolehlivosti Evidence skutečných majitelů, 5. 12. 2022, online: https://datlab.eu/blog/analyza-spolehlivosti-evidence-skutecnych-majitelu/.
[53] Seznam Zprávy, Ministři Válek a Šalomoun vlastní firmy, tvrdí falešně státní evidence, n.d. (accessed 26. 10. 2026), online: https://www.seznamzpravy.cz/clanek/domaci-politika-ministri-valek-a-salomoun-vlastni-firmy-tvrdi-falesne-statni-evidence-196522.
[54] Příbram.cz, Uzavření evidence skutečných majitelů: krok zpět v boji proti korupci?, n.d. (accessed 26. 10. 2026), online: https://www.pribram.cz/clanek/uzavreni-evidence-skutecnych-majitelu-krok-zpet-v-boji-proti-korupci/33514.
[55] Konkursní noviny, Evidence skutečných majitelů odporuje právu EU, n.d. (accessed 26. 10. 2026), online: https://www.kn.cz/nejvyssi-soud-povinnost-zapisu-skutecnych-majitelu-nelze-vynucovat-dokud-nezmenime-zakon/.
[56] Ministerstvo spravedlnosti České republiky, Evidence skutečných majitelů se změní: přístup už nebude veřejný, n.d. (accessed 26. 10. 2026), online: https://msp.gov.cz/web/msp/tiskove-zpravy/-/clanek/evidence-skute%C4%8Dn%C3%BDch-majitel%C5%AF-se-zm%C4%9Bn%C3%AD-p%C5%99%C3%ADstup-u%C5%BE-nebude-ve%C5%99ejn%C3%BD.
[57] ČTK, Přístup k evidenci skutečných majitelů firem budou mít jen ověření lidé, České noviny, 22. 6. 2026, online: https://www.ceskenoviny.cz/zpravy/pristup-k-evidenci-skutecnych-majitelu-firem-budou-mit-jen-overeni-lide/2841912.
[58] Měšec.cz, Stát omezí přístup do evidence skutečných majitelů firem. Z novely potichu zmizela část pro boj s korupcí, 24. 6. 2026, online: https://www.mesec.cz/aktuality/stat-omezi-pristup-do-evidence-skutecnych-majitelu-firem-z-novely-potichu-zmizela-cast-pro-boj-s-korupci/.
[59] Hospodářské noviny, Stát opět pootevře dvířka do evidence skutečných majitelů firem. Ti uvidí, kdo se na ně informoval, 23. 6. 2026, online: https://archiv.hn.cz/c1-67895250-stat-opet-pootevre-dvirka-do-evidence-skutecnych-majitelu-firem-ti-uvidi-kdo-se-na-ne-informoval.

2.3 Czech act on the Implementation of International Sanctions

Since 2021, Czech Act No. 69/2006 Coll. on the Implementation of International Sanctions has been amended six times[60], most substantially after Russia's 2022 invasion of Ukraine. The 2022 amendment (Act No. 240/2022 Coll.)[61] strengthened the powers of the FAU and Customs Administration, improved the freezing, management and possible sale of sanctioned assets, and linked the Act to the new national sanctions regime[62] (Act No. 1/2023 Coll.). A September 2024 amendment allowed Czechia to ask other countries to enforce its freezing measures and abolished prior notification of freezing. Since November 2024, the FAU has used a general measure making UN sanctions listings directly applicable until they are transposed into EU law (MONEYVAL, 2025[63]). Further amendments followed in 2025, including Act No. 218/2025 Coll.[64], which from July 2025 expanded the role of customs authorities as police bodies for certain offences.

MONEYVAL, the Council of Europe body evaluating compliance with FATF[65] standards on anti-money laundering, terrorist financing and targeted financial sanctions, placed Czechia under its Compliance Enhancing Procedures in December 2023 because Recommendation 6 (terrorism-related targeted financial sanctions) remained only partially compliant. By May 2025, it considered the "without delay" problem solved. Three shortcomings remained: freezing depended on a discretionary decision by the FAU, the range of assets covered was too narrow, and the prohibitions on making funds available fell short of the FATF standard (MONEYVAL, 2025[66]). In December 2025, MONEYVAL removed Czechia from the procedures[67]. Even so, rules preventing assets from reaching sanctioned persons indirectly, including through companies they own or control, remain a relevant area for further amendments.

[60] Česká republika, Zákon č. 69/2006 Sb., o provádění mezinárodních sankcí, DAUC, n.d. (accessed 26. 10. 2026), online: https://www.dauc.cz/predpisy/2559/69-2006-sb.
[61] Právní prostor, Novela zákona o provádění mezinárodních sankcí, n.d. (accessed 26. 10. 2026), online: https://pravniprostor.cz/zmeny-v-legislative/vyslo-ve-sbirce-zakonu/novela-zakona-o-provadeni-mezinarodnich-sankci.
[62] Právní prostor, Sankční zákon, n.d. (accessed 26. 10. 2026), online: https://pravniprostor.cz/zmeny-v-legislative/vyslo-ve-sbirce-zakonu/sankcni-zakon.
[63] MONEYVAL, Czechia: Second Compliance Enhancing Procedures Report, Council of Europe, 3. 6. 2025, online: https://rm.coe.int/moneyval-2025-10-ceps-report-czechia/1680b6893f.
[64] Nejvyšší státní zastupitelství, Zpráva o činnosti státního zastupitelství za rok 2025 – textová část, 2026, online: https://verejnazaloba.cz/wp-content/uploads/2026/06/ZPR%C3%81VA-O-%C4%8CINNOSTI-SZ-ZA-ROK-2025-textov%C3%A1-%C4%8D%C3%A1st.pdf.
[65] The Financial Action Task Force (FATF) is an independent international inter-governmental body established in 1989 by the G7 to set global standards against money laundering, terrorist financing, and proliferation financing.
[66] MONEYVAL, Czechia: Second Compliance Enhancing Procedures Report, Council of Europe, 3. 6. 2025, online: https://rm.coe.int/moneyval-2025-10-ceps-report-czechia/1680b6893f.
[67] MONEYVAL, Outcome of MONEYVAL 70th Plenary Meeting, Council of Europe, n.d. (accessed 26. 10. 2026), online: https://www.coe.int/en/web/moneyval/-/outcome-of-moneyval-70th-plenary-meeting.

3 EU level sanctions implementation

The EU sanctions-enforcement system remains structurally decentralised. Restrictive measures are adopted at the EU level, but implementation and enforcement rest with Member States and are spread across some 160 national competent authorities[68], producing divergent interpretations, administrative practices and enforcement capacities.

Over the past 12 months, EU sanctions policy has focused more on implementation and circumvention than on simply adding new prohibitions. A major political change was the reduced use of national vetoes after Hungary's change of government: for the first time since 2022, EU leaders agreed in June 2026[69] to extend economic sanctions for twelve months, until 31 July 2027, rather than six. The EU also adopted the 19th[70] (October 2025), 20th[71] (April 2026), 21st[72] (July 2026) and an extensive 22nd[73] (September 2026) package, broadening restrictions on Russian energy, finance, technology and the military-industrial complex. Most sanctions decisions still require unanimity, however, so the risk of political blockage remains. With Hungary more constructive, other national interests have come to the fore: Greece, for example, initially blocked the 21st package[74] to protect its shipping sector and secured a temporary exemption for carrying Russian LNG to third countries.

One of the most important developments has been the shift towards targeting the international infrastructure used to circumvent sanctions. The EU increasingly sanctions not only Russian entities but also third-country exporters, banks, traders, refineries, shipping companies and crypto providers in China and Hong Kong, Central Asia, the UAE and elsewhere. The first use of the EU's anti-circumvention tool[75] against Kyrgyzstan in the 20th package was particularly significant. Although it covers only a narrow set of items (CNC machines and certain telecommunications equipment), it showed that the EU will impose destination-based restrictions on a third country when systematic re-export to Russia cannot be addressed through individual listings alone, and it sets a methodological precedent that could be applied elsewhere. The EU has also expanded due-diligence requirements, including measures to prevent tankers and sensitive technologies from being diverted into Russian supply chains.

[68] BijzonderStrafrecht.nl, Implementation and monitoring of the EU sanctions' regimes, 23. 11. 2023, online: https://www.bijzonderstrafrecht.nl/home/implementation-and-monitoring-of-the-eu-sanctions-regimes.

[69] Council of the European Union, Russia's war of aggression against Ukraine: Council extends economic sanctions for another year, 25. 6. 2026, online: https://www.consilium.europa.eu/en/press/press-releases/2026/06/25/russia-s-war-of-aggression-against-ukraine-council-extends-economic-sanctions-for-another-year/.

[70] European Commission, EU adopts 19th package of sanctions against Russia, 23. 10. 2025, online: https://finance.ec.europa.eu/news/eu-adopts-19th-package-sanctions-against-russia-2025-10-23_en.

[71] Council of the European Union, Russia's war of aggression against Ukraine: 20th round of stern EU sanctions hits energy revenues, military-industrial complex, trade and financial services, including crypto, 23. 4. 2026, online: https://www.consilium.europa.eu/en/press/press-releases/2026/04/23/russia-s-war-of-aggression-against-ukraine-20th-round-of-stern-eu-sanctions-hits-energy-military-industrial-complex-trade-and-financial-services-including-crypto/.

[72] Council of the European Union, 21st package of sanctions: EU hits Russian energy, financial services and crypto hard, 23. 7. 2026, online: https://www.consilium.europa.eu/en/press/press-releases/2026/07/23/21st-package-of-sanctions-eu-hits-russian-energy-financial-services-and-crypto-hard/.

[73] European External Action Service, EU adopts its largest-ever package of sanctions listings, targeting the industry behind Russia's war, 12. 10. 2026, online: https://www.eeas.europa.eu/eeas/eu-adopts-its-largest-ever-package-sanctions-listings-targeting-industry-behind-russias-war_en.

[74] Financial Times, Athens blocks new EU sanctions on Russia to shield Greek shipping company, n.d. (accessed 26. 10. 2026), online: https://www.ft.com/content/fe5298b6-499b-4647-984f-fdcf3917e696.

[75] Ashurst, Overview of the EU's 20th sanctions package, n.d. (accessed 26. 10. 2026), online: https://www.ashurst.com/en/insights/overview-of-the-eus-20th-sanctions-package/.

In finance, the EU has moved beyond Russian banks to target alternative payment infrastructure. The 20th package imposed transaction bans on 20 more Russian banks and on banks in Kyrgyzstan, Laos and Azerbaijan[76] linked to circumvention or to Russia's SPFS messaging system (alternative to SWIFT), and added measures against crypto assets (for example the A7A5 stablecoin) and platforms[77].

The EU is also gradually strengthening the institutional framework for enforcement. Directive 2024/1226 is harmonising criminal penalties for sanctions violations and circumvention, although implementation remains uneven. After the May 2025 transposition deadline, the Commission sent letters of formal notice to 18 Member States[78], for failing to notify full transposition. Several have since acted and some procedures have been closed, but the episode shows how uneven national implementation remains.

The new EU Customs Authority[79], agreed in March 2026 and based in Lille, and its Customs Data Hub should eventually improve coordination of border enforcement and risk analysis. Some activities begin in 2027, the hub opens for e-commerce in 2028, and it becomes mandatory for all traders only in 2034. The Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA), operational since July 2025, will also monitor the implementation of targeted financial sanctions, with direct supervision of around 40 high-risk financial institutions from January 2028[80]. Neither institution is yet fully operational.

In operational coordination, the Commission has expanded its guidance (notably its FAQs) and coordination mechanisms, Europol and Eurojust have strengthened support for cross-border cases, and OLAF contributes on customs-related circumvention. EPPO, by contrast, still lacks competence over sanctions violations as such.[81] Overall the EU should continue to expand the scope of activities and resources of the already established agencies (Eurojust, Europol, AMLA, European Prosecutors Office - EPPO, OLAF, Frontex, EMSA) to implement or help Member States implement sanctions. There has also been a proposal to establish[82] a central EU sanctions watchdog to tackle circumvention. While this would be an important step for better implementation and enforcement, it would most probably take years to establish and make operational.

Gaps also persist in the information infrastructure. Beneficial-ownership registers exist across the EU, but concerns remain over data quality and verification, and, as noted in the Czech chapter, access has narrowed since the Court of Justice's 2022 WM and Sovim ruling.

Taken together, differences in national administrative and investigative capacity continue to create scope for enforcement arbitrage. EU-level harmonisation

[76] Olof Konig, Courtney Mackness and Paul Stoss, EU implements 20th sanctions package against Russia, Baker McKenzie, 24. 4. 2026, online: https://sanctionsnews.bakermckenzie.com/eu-implements-20th-sanctions-package-against-russia/.

[77] Gonzalo Saiz Erausquin, *The Shadow Crypto Economy Feeding Russia's War Machine*, Royal United Services Institute, 20. 2. 2026, online: https://www.rusi.org/explore-our-research/publications/commentary/shadow-crypto-economy-feeding-russias-war-machine.

[78] eucrim, Infringement Proceedings for Not Transposing Sanctions Directive, 15. 8. 2025, online: https://eucrim.eu/news/infringement-proceedings-for-not-transposing-sanctions-directive/.

[79] European Commission, Commission welcomes historic agreement to reform EU Customs Union, 26. 3. 2026, online: https://cyprus.representation.ec.europa.eu/news/commission-welcomes-historic-agreement-reform-eu-customs-union-2026-03-26_en.

[80] FinTech Global, EU's AMLA puts high-risk banks on notice for 2028, 31. 7. 2026, online: https://fintech.global/2026/07/31/eus-amla-puts-high-risk-banks-on-notice-for-2028/.

[81] Elie Cavigneaux, Untapped Potential at the European Public Prosecutor's Office: Expand the Mandate to Include Sanctions Enforcement, Stiftung Wissenschaft und Politik, SWP Comment 2026/C 23, 16. 6. 2026, online: https://doi.org/10.18449/2026C23v02.

[82] Greenberg Traurig, G7 Sanctions Enforcement Coordination Mechanism and Centralized EU Sanctions Watchdog Proposed, 27. 2. 2023, online: https://www.gtlaw.com/en/insights/2023/2/g7-sanctions-enforcement-coordination-mechanism-and-centralized-eu-sanctions-watchdog-proposed.

narrows this scope in criminal law, but its practical effect will depend on how consistently the EU members resource and apply the new framework.

3.1 Wider cooperation among EU, UK and G7 partners

The US decision to reauthorise imports of Russian diesel marks a divergence within the sanctions coalition. The Treasury licence issued on 9 October 2026 permits specified transactions involving Russian diesel, including imports into the United States, until 7 April 2027. This creates an authorised revenue channel for Russia.

The decision substantially weakens the effectiveness of key sanctions measures and strengthens the case for the EU, the United Kingdom, Japan, Canada, Australia and other partners supporting Ukraine—including South Korea, Switzerland and Norway—to sustain their own restrictions and enforcement. These partners should therefore focus on identifying how divergent rules, capacities and implementation affect sanctions on trade, financing and shipping networks, and close documented weaknesses in their own designations, implementation and enforcement.

These partners also also need to share evidence related to sanctions quickly and securely, in a form that the various authorities can use. This would help them better and faster identify sanctions violations and the companies, banks and shipping operators involved in evasion. Joint action should focus on networks supported by credible evidence, with success measured by whether it reduces Russian revenues, restricts access to military supplies and makes sanctions harder and more expensive to evade.[83]

Sustained diplomatic engagement with Washington should complement these enforcement efforts. The EU and the UK, working with other G7 partners, should seek to narrow the scope and duration of US sanctions relief, prevent its extension to other sectors, and secure continued US cooperation against evasion of restrictions that remain in force.

3.2 EU-Russia trade

In 2025, direct EU–Russia goods trade still amounted to €58.1 billion[84], compared with €257.5 billion in 2021: €27.9 billion in EU imports from Russia and €30.2 billion in EU exports. Imports were dominated by energy, with mineral fuels worth about €20 billion (72 % of imports), including natural gas and LNG. Russia still supplied 16% of EU LNG imports in 2025, and limited crude flows continued through the Druzhba pipeline to Hungary and Slovakia under existing derogations. Other imports

[83] Further country-specific assessments of differences in sanctions implementation:
Luke Wickenden and Isaac Levi, September 2026—Monthly analysis of Russian fossil fuel exports and sanctions, Centre for Research on Energy and Clean Air, 16. 10. 2026 (updated 20. 10. 2026), online: https://energyandcleanair.org/september-2026-monthly-analysis-of-russian-fossil-fuel-exports-and-sanctions/.
Senate Foreign Affairs, Defence and Trade References Committee, Effectiveness of sanctions against the Russian Federation, Parliament of Australia, 20. 8. 2026, online: https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Foreign_Affairs_Defence_and_Trade/SanctionsAgainstRussia48/Report.
Robin Brooks and Ben Harris, An update on Europe's Russia sanctions, Brookings Institution, 6. 8. 2026, online: https://www.brookings.edu/articles/an-update-on-europes-russia-sanctions/.
Brad Spicher, The Coordination Gap: Improving G7 Economic Sanctions Alignment, Center for Strategic and International Studies, 27. 7. 2026, online: https://www.csis.org/blogs/charting-geoeconomics/coordination-gap-improving-g7-economic-sanctions-alignment.
Gonzalo Saiz Erausquin, SIFMANet: Tokyo Report, Royal United Services Institute, 29. 1. 2025, online: https://www.rusi.org/explore-our-research/publications/conference-reports/sifmanet-tokyo-report.

[84] European Commission, EU trade relations with Russia, n.d. (accessed 26. 10. 2026), online: https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/russia_en.

included chemicals (€3.1 billion), fertilisers (Russia remained the EU's largest fertiliser supplier[85]), metals and agricultural goods. EU exports were led by chemicals, including pharmaceuticals, at €14.5 billion, followed by food and raw materials at €5.7 billion and machinery and transport equipment at €3.1 billion. Much of this trade remains legal: food, medicines and other humanitarian goods are exempt from sanctions, many goods were never covered by sectoral bans, and some transactions are allowed under derogations or licences.

In June 2026, the Kiel Institute proposed a "Ukraine Support Tariff"[86] on this remaining trade: an import tariff on Russian goods combined with an export-side levy on EU shipments to Russia. At rates of 30–50%, Kiel estimates it could raise €6–16 billion a year in the short term, or €3–11 billion once wider economic adjustments are taken into account. Even the lower estimates exceed the roughly €3 billion a year generated by interest on frozen Russian assets. Kiel's simulations suggest Russia's value added would fall three to four times more than the EU's, making the tariff sustainable as long-term leverage. The proposal would extend the logic of the EU's existing tariffs on Russian agricultural goods and fertilisers[87], complementing sanctions by making residual trade more costly while generating revenue for Ukraine.

3.3 Russian Sovereign Assets

Over the past 12 months, the debate on immobilised Russian sovereign assets has shifted from outright confiscation towards mechanisms that use their economic value without formally transferring ownership. The EU is central because it holds about €210 billion, of which €185 billion at Euroclear in Belgium; most of the remainder is reportedly held in France[88]. The U.S. holds only around $5 billion, while the UK does not disclose the value of immobilised Russian central-bank assets (CBR).

Since 2024, the EU has used the extraordinary profits generated by the immobilised assets. Under the current system, 95% supports Ukraine via the Ukraine Loan Cooperation Mechanism, which helps repay the G7's €45 billion ERA loans, and 5% goes to the European Peace Facility. With the fifth transfer of €1.4 billion in August 2026, the assets had generated €8 billion in windfall profits[89] since their immobilisation.

In autumn 2025, the Commission proposed a Reparations Loan of around €140 billion, using cash balances accumulated at Euroclear while formally preserving Russia's ownership claim. Belgium opposed the plan without extensive EU-wide solidarity guarantees, citing litigation, Russian retaliation, financial-stability and sovereign-immunity risks arising from the concentration of assets at Euroclear. At its December 2025 summit, the European Council failed to agree on the Reparations Loan[90] and instead agreed to raise €90 billion for Ukraine for 2026–27 through EU

[85] Eurostat, EU trade with Russia – latest developments, n.d. (accessed 26. 10. 2026), online: https://ec.europa.eu/eurostat/statistics-explained/SEPDF/cache/104832.pdf.
[86] Julian Hinz and Moritz Schularick, The Ukraine Support Tariff: How Europe Can Support Ukraine and Weaken Russia, Kiel Institute for the World Economy, June 2026, online: https://www.kielinstitut.de/publications/the-ukraine-support-tariff-how-europe-can-support-ukraine-and-weaken-russia-19839.
[87] Mariya Yemets, *Council of EU imposes steep tariffs on Russian and Belarusian agricultural goods*, Ukrainska Pravda, 12. 6. 2025, online: https://www.pravda.com.ua/eng/news/2025/06/12/7516820/.
[88] Jan Strupczewski, How does the EU want to use Russia's frozen assets for Ukraine?, Reuters, 18. 12. 2025, online: https://www.investing.com/news/stock-market-news/explainerhow-does-the-eu-want-to-use-russias-frozen-assets-for-ukraine-4414581.
[89] European External Action Service, EU receives €1.4 billion in revenue from immobilised Russian assets to be used for supporting Ukraine, 6. 8. 2026, online: https://www.eeas.europa.eu/delegations/ukraine/eu-receives-eur14-billion-revenue-immobilised-russian-assets-be-used-supporting-ukraine_en.
[90] Łukasz Maślanka, Sławomir Matuszak and Iwona Wiśniewska, A bitter compromise over the EU's financial assistance to Ukraine, OSW Centre for Eastern Studies, 19. 12. 2025, online:

borrowing. Ukraine will repay the loan only once Russia has paid war reparations[91], and the EU reserved the right to use the immobilised assets[92] to repay it. The EU also strengthened the freeze in December 2025, adopting Regulation 2025/2600 under Article 122 TFEU to prohibit transfers of immobilised CBR assets back to Russia[93]. Russia's central bank responded by filing a lawsuit against Euroclear[94].

The Czech Republic under its new government, together with Slovakia and Hungary, opted out of the €90 billion loan[95], which was therefore adopted under enhanced cooperation. On the other hand, Czechia did not decide to somehow complicate the situation and in principle also agreed to continue the discussion over the frozen Russian sovereign assets too. At the same time, Czechia has itself benefited from the windfall profits, part of which funded the Czech ammunition initiative[96].

Overall, the policy debate has shifted towards keeping Russian assets immobilised for the long term, using their profits immediately, and exploring ways to leverage the principal for Ukraine without formally confiscating it. The question is already returning: in August 2026, Sweden, the Netherlands, Spain and Poland called on the Commission to resume work[97] on using the assets. Next year, Member States will have to revisit further EU financing for Ukraine. The Commission has proposed mobilising €100 billion for Ukraine within the Ukraine Reserve of the 2028–2034 Multiannual Financial Framework (MFF), or only about €14.3 billion a year, which is not enough to sustain Ukraine even if hostilities end. The insufficiency of the future plans is already illustrated today by Ukraine's demands for pre-financing from 2027 part of the existing EU funding. Any renewed debate on using the Russian sovereign assets will need a solidarity mechanism with Belgium and Euroclear stakeholders to share future liability risks. It should also address how to protect EU decision-makers involved in sanctions and policies against Russia: Belgian politicians and Euroclear executives, including its CEO, have been targeted by an intimidation campaign[98] that European security services attribute to Russian military intelligence.

https://www.osw.waw.pl/en/publikacje/analyses/2025-12-19/a-bitter-compromise-over-eus-financial-assistance-to-ukraine.

[91] Council of the European Union, Council agrees position on legal framework to provide €90 billion in financial support to Ukraine, 4. 2. 2026, online: https://www.consilium.europa.eu/en/press/press-releases/2026/02/04/council-agrees-position-on-legal-framework-to-provide-90-billion-in-financial-support-to-ukraine/.

[92] Maxim Volovich, EU approves €90bn joint debt for Ukraine as reparations loan hits wall, Euromaidan Press, 19. 12. 2025, online: https://euromaidanpress.com/2025/12/19/eu-ukraine-loan-90-billion-hungary-opt-out/.

[93] European Commission, EU to deliver €1.4 billion in revenue from immobilised Russian assets to be used for support to Ukraine, 1. 4. 2026, online: https://luxembourg.representation.ec.europa.eu/actualites-et-evenements/actualites/eu-deliver-eur14-billion-revenue-immobilised-russian-assets-be-used-support-ukraine-2026-04-01_en.

[94] Cyril Barabaltchouk, Russia Launches Intimidation Campaign in Belgium to Block Use of Frozen Assets for Ukraine, UNITED24 Media, 18. 12. 2025, online: https://united24media.com/latest-news/russia-launches-intimidation-campaign-in-belgium-to-block-use-of-frozen-assets-for-ukraine-14390.

[95] European External Action Service, Parliament approves €90 billion Ukraine support loan package, n.d. (accessed 26. 10. 2026), online: https://www.eeas.europa.eu/delegations/ukraine/parliament-approves-%E2%82%AC90-billion-ukraine-support-loan-package_en.

[96] Martin Fornusek, Czechia to use frozen Russian assets profits to fund ammunition for Ukraine, The Kyiv Independent, 20. 8. 2024, online: https://kyivindependent.com/czechia-to-use-frozen-russian-assets-profits-to-fund-ammunition-for-ukraine/.

[97] Meduza, Four EU countries push Brussels to reopen the frozen Russian assets debate, 27. 8. 2026, online: https://meduza.io/en/news/2026/08/27/four-eu-countries-push-brussels-to-reopen-the-frozen-russian-assets-debate.

[98] Oleh Pavliuk and Stanislav Pohorilov, Russian special services intimidate Belgian officials over reparations loan for Ukraine – The Guardian, Ukrainska Pravda, 17. 12. 2025, online: https://www.pravda.com.ua/eng/news/2025/12/17/8012313/.

3.4 China

Since 2022, China has become a decisive[99] economic, technological and diplomatic enabler of Russia's war in Ukraine. Beijing is Russia's largest trading partner and oil customer, with bilateral trade reaching a record $244.8 billion in 2024[100] and on track for a new high in 2026. Chinese companies have replaced many Western suppliers, helping Russia absorb sanctions pressure, keep its banks connected and sustain its economy and defence industry.

China is also the leading source of components for Russian weapons production. Since 2022, it has exported $10.3 billion in Common High Priority List items(CHPL)[101] to Russia, including semiconductors, machine tools, electronic circuits and drone parts, and in 2026 it reportedly accounted for about 90% of sanctioned technology entering Russia[102]. Chinese-origin components have been found in Russian drones; Ukrainian military intelligence found the V2U autonomous drone[103] runs largely on Chinese computers, navigation modules, motors and batteries. China has also supplied drone engines[104] and reportedly nitrocellulose[105] for Russian ammunition production.

Support extends beyond commercial dual-use trade. China has reportedly trained Russian personnel in drone operations[106] or provided satellite imagery for missile targeting[107]. Chinese companies have also helped Russia circumvent export controls through shell firms, intermediaries, false product descriptions and third-country transshipment; in one case, engines were shipped as "cooling units"[108] to a sanctioned Russian weapons maker. Nearly 300 Chinese and Hong Kong entities and individuals have consequently been sanctioned by the U.S. Treasury, and more than 150 added to the U.S. Commerce Department's Entity List.

Diplomatically, Beijing has resisted efforts to isolate Moscow, voting against or abstaining on UN resolutions condemning the invasion and echoing Russian narratives of NATO provocation. China's foreign minister reportedly told Kaja Kallas

[99] NATO, Washington Summit Declaration, 10. 7. 2024, online: https://www.nato.int/en/about-us/official-texts-and-resources/official-texts/2024/07/10/washington-summit-declaration.
[100] U.S.–China Economic and Security Review Commission, China-Russia Fact Sheet: A Short Primer on the Relationship, n.d. (accessed 26. 10. 2026), online: https://www.uscc.gov/research/china-russia-fact-sheet-short-primer-relationship.
[101] U.S.–China Economic and Security Review Commission, China-Russia Fact Sheet: A Short Primer on the Relationship, n.d. (accessed 26. 10. 2026), online: https://www.uscc.gov/research/china-russia-fact-sheet-short-primer-relationship.
[102] Alberto Nardelli, Russia Increases Reliance on China for Critical War Supplies, Bloomberg, 30. 4. 2026, online: https://www.bloomberg.com/news/articles/2026-04-30/russia-increases-reliance-on-china-for-critical-war-technologies.
[103] Defence Intelligence of Ukraine, WAR&SANCTIONS: "розпаковка" нового російського ударного БпЛА V2U зі штучним інтелектом, gur.gov.ua, n.d. (accessed 26. 10. 2026), online: https://gur.gov.ua/content/warsanctions-rozpakovka-novoho-rosiiskoho-udarnoho-bpla-v2u-zi-shtuchnym-intelektom.html.
[104] Reuters, Chinese engines, shipped as 'cooling units', power Russian drones used in Ukraine, 23. 7. 2025, online: https://www.reuters.com/business/aerospace-defense/chinese-engines-shipped-cooling-units-power-russian-drones-used-ukraine-2025-07-23/.
[105] The Economist, How China quietly helps Russia in Ukraine, 20. 5. 2026, online: https://www.economist.com/china/2026/05/20/how-china-quietly-helps-russia-in-ukraine.
[106] Reuters, Russians covertly trained by China return to fight in Ukraine, sources say, 19. 5. 2026, online: https://www.reuters.com/business/aerospace-defense/russians-covertly-trained-by-china-return-fight-ukraine-sources-say-2026-05-19/.
[107] Ukrinform, Китай надає Росії супутникові дані для ракетних ударів по Україні - розвідка, n.d. (accessed 26. 10. 2026), online: https://www.ukrinform.ua/rubric-ato/4043653-kitaj-nadae-rosii-dani-suputnikovoi-rozvidki-dla-zavdanna-raketnih-udariv-po-ukraini-rozvidka.html.
[108] Reuters, Chinese engines, shipped as 'cooling units', power Russian drones used in Ukraine, 23. 7. 2025, online: https://www.reuters.com/business/aerospace-defense/chinese-engines-shipped-cooling-units-power-russian-drones-used-ukraine-2025-07-23/.

in July 2025 that Beijing cannot accept a Russian defeat[109] because it would free the U.S. to focus on China.

The EU has three main policy options towards China: (1) substantially wider Annex IV listings of Chinese suppliers of CHPL goods; (2) transaction bans or asset freezes on Chinese banks and payment intermediaries that knowingly facilitate procurement; and (3) eventually, Article 12f country-level restrictions on selected high-risk technologies if entity-by-entity enforcement proves insufficient. The first two have already been used selectively; the third has so far been applied only to Kyrgyzstan[110].

The EU's caution towards China reflects economic exposure and unfinished diversification policy, fear of retaliation and the unanimity requirement. China is a far larger trading partner than Russia, and in 2025 it restricted rare-earth exports to the EU[111], underlining Europe's dependence on Chinese critical raw materials. When the 18th package listed two Chinese regional banks in July 2025, Beijing soon retaliated with countermeasures against two Lithuanian banks[112]. The EU has therefore preferred targeting small Chinese exporters and intermediaries over major banks or country-wide restrictions.

3.5 Belarus

Over the past 12 months, Belarus has become a sanctions laboratory of a new approach tested primarily by the United States. For the release of political prisoners, the U.S. offered the lowering of the sanctions regime and gradual removal of other trade and other types of barriers for mutual engagement. Nevertheless, this approach has not been followed by the EU, which remains firm in its isolation policy towards the Lukashenka regime which keeps supporting the Kremlin's imperial war.

The Belarusian regime has released over 500 political prisoners in exchange for the removal of sanctions against its state enterprises, namely the Belavia airlines as well as the Belaruskali potash fertiliser producing factory. At the same time, Lukashenka has added more than 200 new political prisoners as pronounced by the Belarusian human rights defenders, primarily their leading organisation Vesna.

While the U.S. has tried to exercise pressure on neighbouring countries, namely Poland and Lithuania, to release their sanctions grip and allow of exports of potash fertilisers via their ports (especially Lithuanian Klaipeda), both countries have found themselves at odds with the US demands countering the common European framework in this respect. As a result, the potash fertilisers might rather find their way to the global markets (important for the U.S.) via Russian ports.

Concurrently, both Poland and Lithuania (as well as Slovakia, for example) have reengaged with Belarus at official fora, including during the September 2026 UN General Assembly, and illustrated their willingness to open bilateral dialogue with the Lukashenka regime once again, even if this should by no means be interpreted as a sign of normalisation in bilateral ties.

In any case, there is a general expectation from the EU to have a strategic discussion on how to further proceed with relations with the Belarusian regime,

[109] South China Morning Post, China tells EU it does not want to see Russia lose its war in Ukraine: sources, 4. 7. 2025, online: https://www.scmp.com/news/china/diplomacy/article/3316875/china-tells-eu-it-cannot-afford-russian-loss-ukraine-war-sources-say.

[110] Council of the European Union, Russia's war of aggression against Ukraine: 20th round of stern EU sanctions hits energy revenues, military-industrial complex, trade and financial services, including crypto, 23. 4. 2026, online: https://www.consilium.europa.eu/en/press/press-releases/2026/04/23/russia-s-war-of-aggression-against-ukraine-20th-round-of-stern-eu-sanctions-hits-energy-military-industrial-complex-trade-and-financial-services-including-crypto/.

[111] Daniel Williams, A rickety Europe tries to stand up to China, Asia Times, 1. 10. 2026 (updated 5. 10. 2026), online: https://asiatimes.com/2026/10/a-rickety-europe-tries-to-stand-up-to-china.

[112] Wester van Gaal, China retaliates against Lithuanian banks following EU-Russia sanctions, EUobserver, 13. 8. 2025, online: https://euobserver.com/eu-and-the-world/ar69e9897d.

while at the same time balancing the position with the democratic forces headed by Sviatlana Tsikhanouskaya. However, it is clear by now that the EU is not planning to align itself with the U.S. position and rethink its policy stance completely.

Finally, and this might be a worrying sign for the future, the Trump administration might be planning to test the waters first with Belarus and later with the Russian Federation too, as recent reflections[113] have shown. And even if this approach directly contradicts the recently approved Graham package of sanctions against the Kremlin passed by a strong bipartisan majority in Congress, and might change after the upcoming mid-term elections, it represents a risky and counterintuitive approach of how to work with Putin's regime who might interpret this as a sign of a weakening of Western unity.

[113] Seznam Zprávy, Američané chtějí na Rusko zkusit metodu, která se jim osvědčila s Běloruskem, n.d. (accessed 26. 10. 2026), online: https://www.seznamzpravy.cz/clanek/zahranicni-nova-rusko-americka-dohoda-na-stole-kdo-by-se-mohl-dostat-na-svobodu-316915.

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