

# EU adopts additional sanctions against Russia and Belarus & UK adopts sanctions end-use controls

28 April 2026

International Trade Controls

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On 23 April 2026, the Council of the European Union adopted a new package of economic sanctions against Russia, marking the twentieth sanctions package introduced since the start of Russia's full-scale invasion of Ukraine. While the EU had initially intended to adopt these measures in February, to coincide with the fourth anniversary of the full-scale invasion, the process was delayed due to opposition from Hungary and Slovakia. Both countries withdrew their objections following the recent elections in Hungary and the repair by the Government of Ukraine of the Druzhba oil pipeline (which transfers oil from Russia to Slovakia and Hungary through Ukrainian territory, and which had been targeted by Russian drone and missile attacks).

The new EU measures introduce a broad range of additional sectoral restrictions, including expanded export, import, and associated services controls, as well as further designations to the EU sanctions list. On the same day, the EU also adopted a parallel set of measures targeting Belarus, aligning the EU-Belarus sanctions regime more closely with the framework applicable to Russia.

Separately, the UK Government has recently introduced Sanctions End-Use Controls ("SEUC"), further strengthening its trade sanctions framework. Legislation to implement the SEUC was laid before the UK Parliament on 22 April 2026, accompanied by detailed guidance issued by the Office of Trade Sanctions Implementation ("OTSI"). The new controls will enter into force on 13 May 2026 and form part of the UK Government's broader efforts to address the circumvention of trade sanctions, particularly where sanctioned goods are routed through non-sanctioned third countries.

## The EU's 20th Package of Sanctions Targeting Russia

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### **Asset-Freezing Sanctions**

[Council Implementing Regulation \(EU\) 2026/509](#) adds a further set of individuals and entities to the EU asset-freezing list. The new designations include a number of Russian energy companies, including certain affiliates of Gazprom Neft, Lukoil and Rosneft. The Regulation also targets entities established in third countries - such as Kazakhstan, China, the United Arab

Emirates and other jurisdictions - that have been identified as supplying to Russia technology, industrial goods and other items subject to EU Russia export restrictions.

As with other EU asset-freezing designations, persons subject to EU sanctions jurisdiction are broadly restricted from dealing, directly or indirectly, with the newly-listed persons and entities, or with any entity that designated parties own a 50% or greater interest in or otherwise control.

In addition, [Council Regulation \(EU\) 2026/511](#) amends Council Regulation (EU) No 269/2014, which sets out the core EU asset-freezing regime in relation to Russia. In particular, the Regulation:

- **Updates and clarifies listing criteria**, including by expanding the grounds on which persons and entities connected to certain high-risk shipping activities may be designated;
- **Introduces targeted exemptions and derogations** from the asset freeze restrictions, notably for limited cultural and historical-responsibility purposes and in particular arbitration-related circumstances; and
- **Strengthens legal protections for EU operators**, including by providing additional tools to address litigation or enforcement actions brought in third countries in connection with contracts affected by EU sanctions.

### **New EU Sectoral Restrictions**

[Council Regulation \(EU\) 2026/506](#) (“Regulation 506”) amends the EU’s principal Russia trade sanctions framework set out in Council Regulation (EU) No 833/2014 (“Regulation 833”). The new regulation both introduces new restrictive measures and expands or adjusts existing ones across a range of sectors. Key developments are summarised below.

### **Export/Import Controls and Associated Services Restrictions**

Regulation 506 expands the scope of goods subject to export and services restrictions under Regulation 833:

- Annex VII (Article 2a – advanced technology items) has been amended to include additional categories of sensitive goods, including certain high-energy explosives and precursors, chemical substances, specialised lubricants, greases, fluids and additives, as well as specific types of laboratory, hygienic, and pharmaceutical glassware.

Regulation 506 also narrows an existing licensing derogation under Articles 2 and 2a of Regulation 833 for restricted exports and services related to cyber-security and information security. Where the derogation previously applied broadly to Russian private entities (excluding the Russian government and state-owned entities), it is now limited to exports or services provided to Russian entities that are owned or controlled by EU Member State entities.

- Annex XXIII of Regulation 833 (Article 3k – industrial capacity items) has been expanded to cover additional goods capable of enhancing Russian industrial capacity. Newly listed items

include certain industrial chemicals, rubber products, metal components, and heavy machinery.

Contracts with regards to those items concluded before 24 April 2026 benefit from a wind-down exemption until 25 July 2026. Further product-specific exemptions and derogations have also been introduced.

In addition, oil and gas equipment previously listed in Regulation 833 in Annex II and subject to the Article 3 export and services restrictions has been transferred exclusively to Annex XXIII and is now regulated solely under Article 3k. This appears intended to avoid overlapping coverage between Annex II and Annex XXIII. (Article 3 continues to apply to certain software used in oil and gas exploration.)

- Annex IV of Regulation 833 has been updated to include new entities subject to enhanced export restrictions on dual-use and advanced technology items (including Annex VII items). The additional designations cover entities located in Russia and in third countries, including Türkiye, the UAE, China, Hong Kong, and Thailand.

Moreover, Regulation 833's Article 3i import and transfer restrictions have been broadened to include a wide range of additional raw materials, metals, chemical inputs, and industrial byproducts. Many of the newly listed items benefit from a wind-down exemption for contracts concluded before 24 April 2026 and executed until 25 January 2027. Further targeted exemptions have been introduced or extended for specific products and projects.

### **Third-country export restrictions**

For the first time in the context of the Russia sanctions regime, the EU has imposed export and related services restrictions targeting a third country. While the EU introduced the legal basis for such measures in June 2023 - and repeatedly signalled that it would use this tool where third countries were being used to circumvent Russia-related export controls - Regulation 506 marks the first application of that authority.

The Kyrgyz Republic has been designated as the first third country subject to these restrictions. As a result, exports to Kyrgyzstan of specific sensitive goods - namely products falling under CN codes 8457 10 and 8517 62 - are now prohibited unless a licence is granted or an applicable exemption applies. Associated services restrictions apply in parallel.

### **Transaction bans**

Regulation 506 further expands existing transaction bans targeting both Russian and non-Russian actors. These measures restrict EU operators from engaging in *any* transaction with the designated entities. The latest annexes (set out in amended Regulation 833) and associated designations include the following:

- An additional 20 Russian banks have been added to the transaction ban applicable to entities listed in Annex XIV, which also captures any Russian entity that is majority-owned by a designated bank.
- One bank in Laos and two banks in Kyrgyzstan have been designated under Annex XLV (Parts A and B), and one bank in Azerbaijan has been added to Annex XLIV.

- Non-financial entities have been listed in the newly created Part D of Annex XLV, which captures entities that provide services enabling international transactions - such as netting, set-off, settlement, or reconciliation - that frustrate EU sanctions. The ban also extends to entities acting on behalf of such operators or providing equivalent enabling services, as defined by specific criteria in the Regulation.
- Annexes LIV, LV and LVI (currently without entries) has been included to designate entities that have benefited from Russian “temporary management” or other expropriation-related measures, have been involved in the enforcement of certain legal judgments, or have used, or continue to use, intellectual property rights or trade secrets owned or licensed by EU persons without the right holder’s consent.
- The regulation includes a new prohibition against dealings with any entity established in Russia that provides crypto-asset services or operates a platform enabling the exchange or transfer of crypto-assets.

In addition, existing restrictions on transactions involving certain crypto-assets and central bank digital currencies listed in Annex LIII have been expanded to include two additional categories of crypto-assets.

Notably, the EU has also removed five banks established in China and Tajikistan from the transaction bans to which they had previously been subject for facilitating restricted trade with Russia. The de-listings follow a determination by the EU that the banks concerned had ceased and remedied the sanctioned activities.

### **EU Broadcasting Sanctions**

The existing prohibition in Article 2f of Regulation 833 on broadcasting content produced by specifically designated Russian media entities has been expanded to also cover non-listed “mirror” entities. These are defined in the regulation as entities that replicate the activities of designated media outlets and meet at least two of the following criteria: (a) substantially identical content or content feeds; (b) continuity of branding, design, or user interface; (c) overlapping ownership, control, or management; (d) redirection or migration of users from a designated entity; or (e) continuity of technical infrastructure, including the use of the same code base, domains, or applications.

### **Energy sector restrictions**

Regulation 506 introduces a series of targeted measures aimed at further constraining Russia’s energy sector, in particular LNG-related activities and maritime transport. Key changes include the following:

- Maritime services and the oil price cap: Contrary to earlier reports, the Council has not imposed a comprehensive ban on maritime services for Russian crude oil and petroleum products destined for third countries. Such transactions remain eligible for an exemption where the products are purchased at or below the applicable price cap. Regulation 506 instead announces a general willingness on the part of the Council, following coordination with the G7 and other members of the Price Cap Coalition, to introduce a full maritime services ban at a later stage.

- Natural gas condensates: Regulation 506 introduces a new prohibition, effective 1 January 2027, on the import, purchase, and transfer of natural gas condensates falling under subheading CN 2709 00 10 from liquefied natural gas production plants. As of the same date, the prohibition on providing maritime services will also be extended to cover these products.
- LNG terminal services: From 1 January 2027, a new prohibition will apply to the provision of LNG terminal services to Russian natural or legal persons, and EU entities that are owned or controlled by Russian persons.
- Sale of oil and product tankers: The Regulation tightens existing measures targeting Russia's so-called shadow fleet by tightening restrictions on the sale of tankers used to transport crude oil or petroleum products to, or for use in, Russia. EU sellers transferring such vessels to purchasers outside Russia are now subject to enhanced due-diligence obligations. These include assessing the risk that a vessel could be re-exported or transferred to Russia and implementing appropriate mitigation measures, notably contractual provisions prohibiting any onward resale or transfer, together with a requirement that the purchaser impose equivalent restrictions in any subsequent transaction.
- Services related to tankers and ice-breakers: Regulation 506 also introduces a new prohibition on the provision of technical assistance, brokering services, as well as financing or financial assistance related to ice-breaker vessels (CN code ex 8906 90) and LNG tankers (CN code ex 8901 20). The ban applies where such vessels are Russian-flagged, certified by the Russian Maritime Register of Shipping, owned or managed by Russian persons, operated in Russia, or intended for use in Russia.

### Legal protections for EU operators

Regulation 506 introduces a set of measures aimed at strengthening the legal protection available to EU operators that are facing litigation or that have suffered losses as a result of EU sanctions or retaliatory measures adopted by the Russian authorities. These measures include, in particular, the following:

- No-claims clause: The scope of the so-called no-claims clause in Article 11 of Regulation 833 has been expanded. The provision, which prohibits EU operators from satisfying claims brought by Russian entities in connection with contracts whose performance was prevented by EU sanctions, now also applies to claims brought by non-Russian entities involved in the sale or supply of goods restricted under the Regulation to Russian counterparties.

This extension is intended to protect EU operators against claims by such non-Russian parties where EU operators suspend or terminate supplies to persons in third countries (other than Russia) because the goods are ultimately destined for Russia and are subject to export prohibitions under Regulation 833.

- Damages recovery and litigation safeguards: Regulation 506 further strengthens the existing damages recovery regime, which allows EU persons to seek compensation before the courts of Member States for losses arising from sanctions-related claims brought by Russian

parties before third-country courts. The amended framework, set out in Article 11a(2) of Regulation 833, now expressly extends this right to cover damages resulting from the enforcement in third countries of judgments based on such claims. An equivalent amendment has been introduced into Article 11b of Regulation 833, which allows EU persons to seek damages in relation to Russian asset expropriation measures.

Finally, Regulation 506 introduces a new Article 11ca, providing EU persons with the right to obtain judicial safeguards against sanctions-related litigation in Russia, in circumstances where Russian parties initiate proceedings before Russian courts in breach of an exclusive jurisdiction or arbitration clause.

### Other Restrictions

- **Diamonds:** The Regulation amends the existing traceability requirements applicable to the trade of Russian diamonds by obliging importers of polished diamonds - including diamonds polished in third countries - to submit a due-diligence statement confirming that the diamonds were not mined, processed, or produced in Russia.
- **Professional services:** A new restriction prohibits the provision of managed security services to any entity, including government entities, in Russia.
- **Donations:** The existing ban on accepting donations or other economic benefits from the Russian government or affiliated entities has been expanded. It now also applies to EU research institutes, higher education establishments, and other EU-based bodies, as well as individuals associated with those entities.
- **Port ban:** The EU has expanded Annex XLII to Regulation 833, adding further vessels to the list subject to the port access ban and related service restrictions under Article 3s. The newly designated vessels are linked to Russia's so-called shadow fleet.

### New EU-Belarus Sanctions

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On 23 April 2026, the Council adopted additional restrictive measures against Belarus in response to its support for Russia's full-scale invasion of Ukraine. [Council Regulation \(EU\) 2026/513](#) ("Regulation 513") amends and expands the existing Belarus sanctions regime established under [Council Regulation \(EC\) No 765/2006](#) ("Regulation 765"). The new measures are intended to align the Belarus sanctions framework more closely with the EU's sanctions imposed on Russia. The new Belarus sanctions include the following measures of particular note:

#### Export/Import Controls

The new measures add additional items to the following Annexes to Regulation 765. These additions largely correspond with changes made to the export Annexes in Regulation 833 outlined above:

- Annex Va, which lists "goods and technology which might contribute to Belarus's military and technological enhancement, or the development of the defense and security sector";

- Annex XVIII, which lists “goods and technologies which could contribute to the enhancement of Belarusian industrial capacities”;
- Annex XXV, which lists “luxury goods”.

In line with the approach taken under the Russia sanctions regime, the Regulation also broadens existing import and transfer restrictions by adding further categories of raw materials, metals, chemical inputs, and industrial by-products.

### Other Sectoral Restrictions

- Professional service sanctions: Consistent with amendments to the Russia sanctions regime, the Regulation expands the professional services restrictions set out in Article 1jc of Regulation 765. In particular, it introduces new prohibitions on the provision of managed security services and services directly related to tourism activities in Belarus. In addition, mirroring the approach taken under the Russia sanctions, the Regulation establishes a broad catch-all restriction covering the provision of any services not otherwise addressed in Article 1jc. Unlike the Russia professional services sanctions, however, the restrictions in Article 1jc apply only to services provided to the Republic of Belarus, its Government, or its public bodies, corporations, or agencies, as well as persons acting on their behalf.
- Transaction bans: Regulation 765 is further expanded to include additional transaction bans, including a new ban under Article 1zd targeting Russian entities that seek to enforce sanctions-related judgments outside the European Union, as listed in Annex XXXIII (which currently contains no entries). The Regulation also prohibits transactions with any legal person, entity, or body that provides crypto-asset services or operates a platform enabling the exchange or transfer of crypto-assets and is established in Belarus.

In addition, Regulation (EU) 2026/513 introduces a new prohibition on engaging, directly or indirectly, in any transaction involving the crypto-assets or central bank digital currencies listed in Annex XXXIV, as well as on providing any support for the development of such crypto-assets or central bank digital currencies.

### Legal Protections for EU Operators

Consistent with the amendments made to the Russia sanctions regime, Regulation (EU) 2026/513 strengthens the legal protections available to EU persons complying with the Belarus sanctions. In particular, the Regulation expands Article 8d to extend the prohibition on the satisfaction of claims arising from contracts or transactions affected by EU restrictive measures, including claims brought by persons established in third countries outside Belarus.

In addition, the Regulation introduces a new Article 8h, which grants EU natural and legal persons an express right to seek compensation before Member State courts for damages incurred as a result of judicial or administrative proceedings brought outside the Union to enforce such claims.

## New Asset Freezing Designations

In addition, [Council Implementing Regulation \(EU\) 2026/505](#) designates additional individuals and entities for EU asset-freezing measures. The newly listed parties include CJSC Belarusian Oil Company, Belarus's leading petroleum exporter.

## UK Sanctions Developments

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### *UK introduction of Sanctions End-Use Controls*

On 22 April 2026, the UK Government laid [legislation](#) before Parliament to introduce Sanctions End-Use Controls ("SEUC") into a number of existing UK trade sanctions regimes. The new controls are intended to curb the diversion of trade-sanctioned goods and related technologies through non-sanctioned third countries for use in sanctioned jurisdictions, or by persons connected with those jurisdictions. The SEUC form part of the UK Government's broader and ongoing efforts to strengthen its response to the circumvention of trade sanctions.

In parallel with the legislative changes, the Office of Trade Sanctions Implementation ("OTSI") published supporting [guidance](#) for businesses that may be affected by the new controls. The SEUC will enter into force on 13 May 2026.

The new SEUC apply across all UK trade sanctions regimes where trade restrictions extend beyond arms embargoes (in which case military end-use controls already apply). In practice, this means that the SEUC cover sanctioned goods and related technologies under a range of regimes, including those relating to Russia and non-government-controlled territories of Ukraine, Belarus, as well as other sanctioned jurisdictions.

The SEUC introduce a new, targeted licensing requirement for exports of certain goods and related technology to non-sanctioned third countries in circumstances where the exporter has been formally informed by the UK Government that there is a risk of the items being diverted onwards to a sanctioned destination or to a person connected with such a destination. The regime is therefore not self-executing: the obligation to obtain a licence arises only where the Government has issued a case-specific "informing" notice identifying a diversion risk linked to the goods, the route, the intermediary or the end user.

Once an exporter has been informed, it becomes a criminal offence to proceed with the export of the goods or technology in scope without first obtaining an appropriate licence. By contrast, exporters who have not been informed of a licensing requirement may continue to export as normal. The SEUC do not establish a blanket licensing requirement for particular categories of goods or technologies, and exporters will be notified if and when the Government considers a licence to be necessary.

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We are closely monitoring developments concerning the U.S., UK, and EU sanctions against Russia, and will issue further updates in the event of material developments. In the meantime, we would be happy to address any questions you may have.

Covington's International Trade Controls team—which includes lawyers in the firm's offices in the United States, London, Brussels, and Frankfurt—regularly advises clients across business sectors and is well-placed to provide support in connection with the evolving Russia sanctions and export controls. Our trade controls lawyers also work regularly with Covington's Global Public Policy team—consisting of over 120 former diplomats and policymakers in the United States, Europe, the Middle East, Latin America, Africa, and Asia—many of whom have had substantial government experience in sanctions and export controls matters, and who regularly advise our clients on emerging sanctions policy matters and related engagements with government stakeholders. Moreover, as the [Ukraine crisis](#) continues to unfold, Covington is exceptionally well-positioned to assist clients in navigating their most complex challenges, drawing on the multidisciplinary capabilities of additional practices in areas such as international arbitration and disputes, cybersecurity, anti-money laundering, insurance, and corporate restructuring.

If you have any questions concerning the material discussed in this client alert, please contact the following members of our International Trade Controls or International Dispute Resolution practice:

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