EU sanctions against Russia – what to expect from the forthcoming 20th EU sanctions package

On 6 February 2026, the European Commission presented its proposal for the forthcoming 20th EU sanctions package against Russia. Discussions on the proposed package remain ongoing in the Council of the EU with the adoption of the definitive package expected to closely coincide with the fourth anniversary of Russia's invasion of Ukraine on 24 February 2026. If adopted, the proposed measures will further limit the operations of Russia's energy and financial services sectors and introduce additional restrictions on goods and services.

See below an overview of the key measures expected in the forthcoming sanctions package:

Energy Sector

- The forthcoming package will likely introduce a **complete ban on the provision of maritime services for Russian crude oi**l. The introduction of a complete ban on maritime services would encompass a broad range of activities including related maintenance, insurance and financial services.
- The proposed full ban on providing maritime services for Russian crude oil arises in parallel to the European Commission's announcement that a legislative proposal will be tabled in early 2026 to ban all remaining Russian oil imports by the end of 2027.
- In terms of Russian gas, the current proposal includes **a ban on the provision of maintenance** and other services for **liquified natural gas tankers and icebreakers,** although it is not yet clear how this will differ from or expand the already existing restrictions on the provision of technical assistance already contained in Article 3ra(3) of EU Regulation 833/2014.
- To further protect against the circumvention of sanctions, the 20th sanctions package is expected to **list a further 43 vessels** considered to be part of **Russia's shadow fleet.** Additional listed vessels would be banned from accessing EU ports and receiving maritime services.

Financial services

- Moreover, the proposed package is expected to introduce notable new trade restrictions including import restrictions on further metals, chemicals and critical minerals. The current proposal reportedly places an import ban on **unrefined and processed copper, nickel bars, certain scrap metals and iron ores and concentrates.**
- Additionally, the current proposal envisages the introduction of a **quota on imports of ammonia.**
- As regards new export restrictions, the proposed package envisages the imposition of restrictive measures on additional goods, including **tractors and further types of rubber.**
- The proposed package will expand existing service restrictions to include certain **cybersecurity services.**

Other measures

Additionally, the EU has announced its intention to activate for the first time the **anti-circumvention tool** and prohibit the export of **computer numerical control machines and radios** to countries posing a **high-risk of re-exportation to Russia.** The forthcoming package is also expected to encompass **strengthened legal safeguards** for EU operators facing **violations of their IP rights or unfair expropriation** in Russia in connection with abusive Russian court rulings involving sanctions.

Key Takeaways

In light of ongoing negotiations among EU Member States, the present proposal is merely indicative of the measures under discussion and consequently may be subject to significant change and/or supplemented by further restrictions.

EU operators engaging with entities involved in the industries concerned by these proposed measures should closely monitor the development of this proposal, assess the potential impact on their business and ensure that their compliance procedures are sufficient to address the risks posed by the potential adoption of these measures. The forthcoming package is expected to continue to tackle third country operators assisting EU sanctions circumvention efforts and accordingly, compliance procedures should fully factor in the increased risk of further restrictions on third-country operators and banks.

The forthcoming 20th EU sanctions package demonstrates that the push to increasingly restrict Russian energy imports shows no sign of stopping. The imposition of a full maritime services ban for Russian crude oil would likely have far-reaching effects as it would further complicate and restrict the sale of Russian crude oil. As a result, this measure could lead to increased efforts to circumvent EU sanctions, for example, through the heightened use of Russia's shadow fleet. Moreover, comparable to the recently adopted regulation to phase out Russian gas imports, the EU appears to be combining restrictions through sanctions packages and separate legislative acts to phase out Russian oil imports. Given the on-going discussions aimed at achieving a peace deal between Russia and Ukraine which may lead to a winding back of sanctions restrictions, the existence of alternate legislation intended to reduce the EU's reliance on Russian energy will mean that the EU will still be able to restrict Russian energy imports.

With thanks to Roisin O'Donovan, Emily Greenaway and Sophie Sundaram for their contributions to this article.

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