

EU MEASURES CONCERNING RUSSIAN GAS AND MEASURES BY OTHER COUNTRIES

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Background and Measures by UK and EU

- Commission adopted RePower Europe in March 2022.
- UK banned import of Russian LNG in January 2023.
- UK banned maritime transport and related services—like insurance—for Russian liquefied natural gas (LNG) exports to third countries on 15 October 2025.
- Rosneft and Lukoil, as well as Indian's refinery Nayara Energy Limited added to sanctions list.
- EU's 19th Sanctions Package
 - Article 3ra: “It shall be prohibited, as of **25 April 2026**, to purchase, import or transfer, directly or indirectly, liquified natural gas falling under CN code 2711 11 00, if it originates in Russia or is exported from Russia.”

Background and Measures by UK and EU

- Exemption for certain long-term LNG contracts conclude before 17 June 2025 until 1 January 2027.
- Exemption for transit (Articles 5 and 11).
- Full transaction ban on major companies Rosneft and Gazprom Neft.
- Measures against important third country operators: sanctioning two Chinese refineries and an oil trader that are significant buyers of Russian crude oil.
- Import ban on a variant of LPG.

Proposal to phase out Russian gas

- All new contracts for imports of Russian pipeline gas and LNG prohibited from 6 weeks after the regulation enters into force.
- Transition period for existing contracts:
 - On LNG: S-T contracts concluded before 17 June 2025 will be prohibited from 25 April 2026. L-T term contracts concluded before 17 June 2025 prohibited from 1 January 2027.
 - On pipeline gas: S-T contracts conclude before 17 June 2025 will be prohibited from 17 June 2026. L-T contracts concluded before 17 June 2025 prohibited from 1 October 2027.
 - In case a Member State faces difficulties to fill its storages to the required level, the import ban would only apply as of 1 November 2027.
- Articles 5 and 6 regarding prohibition of providing LNG long term terminal services to Russian customers deleted.
- Penalty provision of maximum 3.5% of worldwide turnover or lump sum of 40 mln or 300% of value of Cargo.

US measures against Rosneft and Lukoil

- On 22 October 2025 the US Office of Foreign Assets Control (“**OFAC**”) designated Lukoil pursuant to Executive Order 14024 as operating or having operated in the energy sector of the Russian Federation.
- Back in January 2025 a determination was issued extending the application of Executive Order 14024 to the energy sector
- As of 22 October 2025 all property and interests of Lukoil in the US were blocked and any of its property or interests that are or come within the possession or control of a US person are also blocked.
- In addition, any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by one or more by the Lukoil or any of the above listed companies which are located in the US are also blocked.

US measures against Rosneft and Lukoil

- Accordingly, going forward unless authorised by a general or specific license issued by OFAC, all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of Lukoil or Rosneft or any of their subsidiaries are prohibited.
- Importantly, foreign financial institutions that conduct or facilitate significant transactions or provide any services to Russian energy sector including the sale, supply or transfer, directly or indirectly of any items or class of items determine by the Secretary of the Treasury may (i) be prohibited from opening or maintaining correspondent accounts or payable-through accounts in the United States or (ii) have all of its property and interests in property located in the United States, or that come within the United States, or that are or come within the possession or control of any United States person blocked (Executive Order 14024 as amended by Executive Order 14114).

Thank you for your attention !

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