

EU, UK and US Sanctions Updates

Member Circular No. 14/2025

14 November 2025

October and November 2025 have witnessed a significant wave of new restrictions and designations against Russia, introduced by the EU, the UK, and the US.

Further details are set out below, but we highlight several key common themes:

- Coordinated escalation targeting Russia's energy sector, with particular focus on LNG (including insurance of the carriage of LNG) and major oil companies.
- Heightened scrutiny of shadow fleet operations and third-country intermediaries facilitating sanctions evasion.
- Broadened export controls and tightened financial measures aimed at closing circumvention channels.

EU Sanctions – 19th Package

On 23 October 2025, the Council of the European Union introduced its [19th sanctions package](#), significantly expanding restrictions on Russia's energy sector, financial infrastructure, and military-industrial complex by amending [Regulation \(EU\) 833/2014](#) and [Regulation \(EU\) 269/2014](#). Key measures include:

- **Energy Sector**
 - Comprehensive ban on imports of LNG originating in or exported from Russia into the EU:
 - Effective **25 April 2026** for short-term contracts
 - Effective **1 January 2027** for long-term contracts (exceeding one year in duration and concluded before 17 June 2025)
 - Prohibition on technical and financial assistance (including insurance) related to the above prohibitions on the import of LNG.
 - Prohibition on transshipment of Russian LNG in EU ports
 - Tightened transaction ban on **Rosneft** and **Gazprom Neft**

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- **Third-Country Enablers**
 - Sanctions on Chinese entities (two refineries and an oil trader) purchasing Russian crude
 - Listing of **Litasco Middle East DMCC** (Lukoil's UAE-based company)
- **Additional Measures**
 - 69 individuals designated
 - 45 entities designated for supporting Russia's military and industrial complex
 - 117 vessels designated, becoming subject to a port access ban and a ban on the provision of a broad range of services (including insurance) related to maritime transport (bringing the total number of designated vessels to 557)
 - Prohibition on providing certain forms of (re)insurance to vessels formerly operated by Russian interests during the five years following the sale or any form of lease arrangement to third country buyers or lessees.
 - Expanded export controls on electronic components, military-grade metals, and industrial goods
 - Import restrictions on additional metal, oxides and alloys used in the military systems and acyclic hydrocarbons
 - Sanctions on maritime registries providing false flags to shadow fleet vessels
 - Prior authorization requirement for any services provided to the Russian Government not already covered by Regulation (EU) 833/2014
 - Transaction ban expanded to five Russian banks (Istina Bank, Zemsky Bank, Commercial Bank Absolut Bank, MTS Bank, and Alfa-Bank). Four banks from Belarus and Kazakhstan are also put under a transaction ban, due to their connections to Russian financial messaging and payment systems.

UK Sanctions

On 12 November the UK announced its intention to introduce a maritime services ban on Russian LNG. The [press release](#) states that:

This action will significantly reduce Russian exports of LNG and directly cut off access to the UK's world-leading maritime services. The ban will be phased in over 2026 in lockstep with our European partners...

The UK banned the import of Russian LNG in January 2023. We are now going a step further by banning maritime transport and related services—like insurance—for Russian liquefied natural gas (LNG) exports to third countries. UK-linked ships and services won't be allowed to help move Russian LNG globally.

The announcement of the intention to introduce a maritime services ban followed, on 15 October, the UK designation of Rosneft and Lukoil, as well as Nayara Energy Limited (the Indian refinery in which Rosneft is a 49% shareholder), and various other companies. The UK Government's press release for these measures is available [here](#).

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Rosneft and **Lukoil** were added to the UK asset freeze list

- Additional 90 asset freeze targets, including:
 - Four Chinese oil terminals
 - Indian **Nayara Energy Limited**
 - 51 tankers and LNG carriers
 - Five Russian financial institutions
 - Defence sector entities
- **General Licences**
 - General Licence [INT/2025/7539056](#) authorises wind-down of transactions involving Rosneft and Lukoil, and entities owned or controlled by these entities. This licence expires at 23:59 on 28 November 2025.
 - General Licence [INT/2025/7538856](#) authorises wind-down of transactions involving certain energy entities, including Nayara Energy Limited. This licence expires at 23:59 on 13 November 2025.
 - Additionally, on 22 October 2025, OFSI published a General License [INT/2025/7598960](#) authorising business operations involving the Rosneft subsidiaries Rosneft Deutschland GmbH and RN Refining and Marketing GmbH. OFSI also updated FAQs (no. 169) confirming that UK sanctions are not intended to negatively affect the operations of these entities, who have been under trusteeship by the German government since 2022.

US Sanctions

On 22 October 2025, the US [imposed full blocking sanctions](#) on Russia's two largest oil majors:

- **Rosneft** and **Lukoil** designated on the **SDN list**, along with several subsidiaries
- All entities owned 50% or more by either company are blocked
- OFAC issued four general licences, including [Russia-related General License 126](#), "Authorizing the Wind Down of Transactions Involving Rosneft or Lukoil until 21 November 2025

Impacts

The measures outlined above represent a further escalation of sanctions against Russia. In addition to the proposed ban on providing insurance to Russian LNG being carried to third countries, most notable are the measures taken against Rosneft and Lukoil, both of whom are substantial cargo suppliers and shippers of oil and other energy products from Russia. Subject to the wind down permitted under the UK' and US' respective General Licences, Members must ensure that they have terminated all commercial and contractual relationships – including charter parties – with these entities and discharged any cargoes where these entities may be the cargo owner by the expiry date of those General Licences. In effect, that means by latest 21 November 2025. Failure to do so may expose Members to sanctions enforcement measures by the relevant sanctions authorities.

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Members are reminded that cover is not available for any trade that breaches applicable sanctions. Members are advised that they should conduct thorough due diligence on the parties, cargoes, vessels, and other service providers that are or may be involved before they engage in any trade with a high sanctions risk. Finally, Members are reminded to keep records of their due diligence investigations and findings.

All Clubs in the International Group have issued a similarly worded circular.

If you have any questions to the above, please contact [Ingvild Høgenes Nilsen](#), Gard, Arendal.

Yours faithfully,

GARD AS

A handwritten signature in blue ink that reads "Rolf Thore Roppestad".

Rolf Thore Roppestad
Chief Executive Officer