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EU ADOPTS 20TH SANCTIONS PACKAGE AGAINST RUSSIA – KEY IMPLICATIONS FOR THE MARITIME AND TRADE SECTOR

On 23 April 2026, the European Union formally adopted its 20th package of restrictive measures against Russia. This latest package introduces a broad set of measures targeting the energy, maritime, financial and trade sectors. For maritime and trade stakeholders, the package is particularly significant, as it expands existing restrictions affecting shipping operations, cargo flows, and related services.

KEY MEASURES AFFECTING SHIPPING AND MARITIME OPERATIONS

Port infrastructure ban:

The EU has listed two more Russian ports (Murmansk and Tuapse) as well as, for the first time, a third country port (Karimun Oil Terminal, in Indonesia). The package introduces further limitations on access to EU ports

and the provision of maritime services linked to Russian energy exports. These measures are designed to disrupt logistics chains supporting Russian oil and LNG revenues.

Potential Expansion of Maritime Services Ban:

Building on earlier proposals, the EU continues to consider broader prohibitions on maritime services for Russian crude oil transport, signaling a possible shift toward stricter extraterritorial enforcement affecting shipowners, charterers and insurers. The package establishes the legal framework for a potential full maritime services ban covering the transport of Russian crude oil and petroleum products. The ban is not yet in force, however, the Council has said it will decide when the maritime services ban is to enter into

force, considering an appropriate winddown period.

Tanker sales:

The measures include enhanced due diligence requirements on tanker vessel sales from EU persons to any third country. The measures are aimed at preventing Russian end-use and deployment of vessels within the shadow fleet. EU persons must take additional steps in relation to such sales including dedicated due diligence by EU sellers, as well as the inclusion of a mandatory ‘no Russia’ clause that must be passed on into subsequent sales contracts to prohibit the resale or transfer of tanker vessels to Russia. Additionally, a new shadow fleet scrapping clause has been included with the aim of facilitating the decommissioning or ‘recycling’ of

vessels and their exit from the shadow fleet.

LNG tankers and icebreakers:

The package also introduces phased service prohibitions for LNG-related vessels. As of 25 April 2026, it is prohibited to provide technical, financial, and brokering services to Russian-flagged or Russian-managed icebreakers and LNG tankers. A second phase, effective from 1 January 2027, extends this prohibition to foreign-owned icebreakers and LNG tankers operating in Russia, further constraining support for Russia's LNG export infrastructure.

EXPANDED ACTION AGAINST THE "SHADOW FLEET"

The EU has intensified measures targeting vessels used to circumvent oil price cap mechanisms and transport Russian oil outside established compliance frameworks. This includes ad-

ditional vessel listings, port access restrictions, and service prohibitions.

Enforcement

Enforcement remains a central pillar of this package, with increased emphasis on compliance, monitoring, and penalties for breaches—particularly relevant for shipowners, operators, insurers, and financial institutions. For maritime stakeholders the 20th package raises several immediate considerations:

- **Heightened Due Diligence:** Enhanced scrutiny of counterparties, cargo origin, and vessel histories—particularly in relation to shadow fleet exposure.
- **Contractual Risk Allocation:** Review of sanctions clauses in charterparties, sale contracts, and financing arrangements.

- **Insurance and P&I Coverage:** Potential coverage limitations where sanctions risks are identified.

- **Operational Disruptions:** Increased likelihood of port denials, cargo delays, and compliance-related detentions.

Outlook

The EU has signalled that further measures remain under consideration, particularly in the maritime and energy sectors. The trajectory suggests continued tightening of restrictions, combined with more aggressive enforcement against circumvention networks.

Maritime stakeholders should expect ongoing regulatory developments and ensure that compliance frameworks are continuously updated to reflect the evolving sanctions landscape.

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