

EN

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Answer given by Ms Albuquerque
on behalf of the European Commission
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Addressing circumvention of sanctions, which is now a crime under EU law, is a key priority for the EU. The Commission monitors trade flows, especially goods on the Common High Priority¹ and Economically Critical Goods² lists, from the EU to third countries considered to be at high risk of being used as a platform for circumvention, and from these countries to Russia. The EU has several anti-circumvention tools at its disposal. These include imposing sanctions on individuals and entities facilitating circumvention of EU sanctions as per Council Decision 2014/145/CFSP and Council Regulation (EU) No 269/2014³, strengthening export controls towards entities involved in the circumvention of sensitive items to Russia⁴, or the prohibition on export of sensitive goods to a country whose jurisdiction is used to circumvent EU sanctions⁵.

The Commission remains determined to fight sanctions evasion and will continue its rigorous monitoring of trade flows and targeted outreach on the issue of sanctions circumvention and will not hesitate to propose any measures considered necessary. Particular importance is placed on monitoring trade flows which show that EU exports of sensitive goods to third countries are at high risk of re-export to Russia, thus circumventing existing export restrictions. In this context, the Commission can propose to activate the Anti-Circumvention Tool (Article 12(f) of the Council Regulation (EU) 833/2014). The Council decides unanimously on the amendment or adoption of new sanctions.

¹ https://finance.ec.europa.eu/publications/list-common-high-priority-items_en.

² https://finance.ec.europa.eu/publications/list-economically-critical-goods_en.

³ [https://eur-lex.europa.eu/eli/dec/2014/145\(1\)/2025-12-15](https://eur-lex.europa.eu/eli/dec/2014/145(1)/2025-12-15) and <https://eur-lex.europa.eu/eli/reg/2014/269/oj/eng>.

⁴ Annex IV of Council Regulation (EU) No 833/2014, <https://eur-lex.europa.eu/eli/reg/2014/833/oj/eng>.

⁵ Article 12f of Council Regulation (EU) No 833/2014.