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Answer given by Ms Albuquerque
on behalf of the European Commission
(15.7.2026)

The Commission is aware of the operation of Russian state-affiliated aircraft flying into various third countries. Whilst these countries are not bound by EU sanctions, the EU Sanctions Envoy, David O’Sullivan, conducts diplomatic outreach to third countries identified as potential hubs for sanctions circumvention to find mutually agreeable solutions to avoid that EU sanctions are circumvented via these jurisdictions.

The EU has also reinforced its anti-circumvention toolbox and has also imposed direct sanctions on companies based in third countries, that have been found to circumvent sanctions. The EU sanctions law also contains obligations on EU operators to ensure sanctioned goods are not supplied to Russia via third parties, such as deploying enhanced due diligence when trading in Common High Priority (CHP) items¹ or inserting a ‘no re-export to Russia’ clause in their export contracts.

EU agencies and bodies such as Europol, Eurojust and the European Public Prosecutor’s Office (EPPO) are already competent to deal with sanctions violation cases, within their respective competences. Their role and cooperation have also been recognised in the Directive on the criminalisation of the violation of EU sanctions². The Commission is taking due consideration of the reflections of a possible extension of the EPPO’s competence to sanctions violations in the context of the possible revision of the EPPO Regulation³, which the Commission may propose at the end of 2026.

The Commission has also adopted a proposal for a revision of the Europol Regulation⁴ to equip the Agency with new capabilities to enhance its support to Member States’ investigations in targeting criminal assets owned by individuals and legal entities subject to EU sanctions.

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

² See Article 16 of Directive (EU) 2024/1226 <https://eur-lex.europa.eu/eli/dir/2024/1226/oj/eng> .

³ Council Regulation (EU) 2017/1939 <https://eur-lex.europa.eu/eli/reg/2017/1939/oj/eng> .

⁴ Regulation (EU) 2016/794 <https://eur-lex.europa.eu/eli/reg/2016/794/oj/eng> ; https://home-affairs.ec.europa.eu/document/download/70698b35-392c-451a-adeb-3d863386c8a8_en?filename=Europol%20Proposal.pdf .