Buychik, A. (2026). The EU sanctions architecture against Russia: Legal resilience, hybridisation, and long-term effectiveness (2022–2030). *Actual Issues of Modern Science. European Scientific e-Journal, 41*, 7–74. Ostrava.

DOI: 10.47451/esej-pol-13

The paper is published in Crossref, ICI Copernicus, BASE, EBSCO, Zenodo, OpenAIRE, LORY, Academic Resource Index ResearchBib, J-Gate, ISI International Scientific Indexing, ADL, JournalsPedia, Scilit, Mendeley, and WebArchive databases.

Alexander Buychik, Doctor of Economic Sciences, Ph.D. in Political Sciences, Supervisor, European Institute for Innovation Development, Tuculart Holding. Ostrava, Czech Republic.
ORCID 0000-0002-2542-4198

The EU Sanctions Architecture against Russia: Legal Resilience, Hybridisation, and Long-Term Effectiveness (2022–2030)

Abstract:
The study is relevant because the sanctions regime of the European Union against Russia has evolved into one of the most extensive and institutionally complex systems of restrictive governance in contemporary international politics. The research problem lies in the fact that sanctions effectiveness is still often interpreted through simplified success–failure models that do not adequately explain the cumulative, adaptive, and institutionally mediated character of mature sanctions regimes. The scientific novelty of the article consists in conceptualising the EU sanctions regime against Russia as an integrated governance architecture whose long-term effectiveness is determined by the interaction of legal resilience, hybrid adaptability, and compliance capacity. The object of the study is the EU sanctions regime against the Russian Federation, while the subject of the analysis is the institutional, legal, and operational mechanisms that shape its long-term effectiveness. The study aims to determine how legal resilience, the hybridisation of restrictive instruments, and compliance-based operationalisation influence the durability and strategic relevance of the EU sanctions regime. The methodological framework combines institutional and legal analysis, political economy analysis, comparative-historical interpretation, and public policy effectiveness analysis. The study engages classical sanctions scholarship and contemporary approaches to EU governance, legal resilience, hybrid sanctions, and compliance-based enforcement. The results show that the EU sanctions regime should be understood not as a mere aggregate of restrictive packages, but as a cumulative and internally differentiated governance architecture. The analysis demonstrates that legal resilience is a core condition of long-term effectiveness because it secures clarity, judicial defensibility, proportionality, and update capacity. It also establishes that hybrid sanctions extend restrictive pressure into enabling infrastructures, intermediary systems, and adaptive networks, while compliance acts as the operational transmission mechanism through which legal norms are converted into practical behavioural constraints. At the same time, the study identifies structural limits of the regime, including complexity, enforcement asymmetry, adaptation through substitute networks, and the risk of diminishing returns in the mature phase of sanctions governance. The article concludes that the long-term effectiveness of EU sanctions depends less on the formal expansion of restrictive measures than on the institutional quality of the sanctions architecture itself. In prolonged geopolitical confrontation, sanctions remain strategically significant only when they are legally resilient, adaptively extended, proportionately maintained, and operationally implemented through coherent compliance and coordination mechanisms.

Keywords: EU sanctions regime, Russia, sanctions effectiveness, legal resilience, hybrid sanctions; compliance capacity, integrated governance architecture, anti-circumvention policy, transnational regulatory governance, European Union.

Introduction

Since 2022, the sanctions regime of the European Union against the Russian Federation has evolved into one of the most extensive and structurally complex restrictive-policy frameworks ever implemented by the EU. Initially conceived as a response to violations of Ukraine's territorial integrity, the regime has progressively expanded into a multi-layered system encompassing political, economic, legal, technological, and administrative instruments designed to constrain Russia's capacity to sustain military aggression and to signal the normative commitments of the European Union within the international order (*Council of the European Union, 2014a*; *Council of the European Union, 2014b*; *European Commission, 2025*). Over time, this framework has moved beyond a limited set of diplomatic and economic measures and has instead developed into a comprehensive architecture of restrictive governance involving legislative acts, interpretative guidance, enforcement coordination, and compliance mechanisms across both public and private sectors.

The significance of this transformation lies in the fact that sanctions are no longer merely episodic foreign policy tools but have become a sustained institutional regime embedded in European regulatory practice. In particular, the EU's sanctions against Russia have expanded through successive legislative amendments, regulatory clarifications, and complementary administrative instruments aimed at closing loopholes, countering circumvention, and ensuring effective implementation across Member States (*Council of the European Union, 2022*; *European Commission, 2026*). As a result, the sanctions framework increasingly functions as a form of transnational governance that integrates legal norms, market regulation, financial supervision, and cross-border coordination mechanisms.

A particularly important analytical point of departure for the study is the collective policy-analytical volume *The EU Sanctions Architecture against Russia: Effectiveness, Limits, and Strategic Options for 2026–2030* (*Buychik et al., 2026*). Positioned at the intersection of institutional analysis and forward-looking policy assessment, this publication treats the EU sanctions regime not as a mere sequence of restrictive packages, but as an integrated and cumulative architecture composed of political, economic, social, legal, hybrid, and compliance dimensions. It also emphasises that the real effect of restrictive measures is produced through the interaction of legal instruments, administrative routines, market behaviour, implementation practices, and adaptive responses, and that the quality of the accumulated regime becomes more important over time than the mere addition of further measures. In this respect, the report provides an important analytical basis for the present article, while the article itself develops these insights further within a more explicitly academic and theoretically systematised framework (*Buychik et al., 2026*).

This institutionalisation of sanctions policy raises important analytical questions for contemporary research. While the existing scholarly literature has extensively examined the economic impact and political signalling of sanctions (*Drezner, 1999*; *Hufbauer et al., 2009*; *Pape, 1997*), considerably less attention has been devoted to the structural properties that determine the long-term effectiveness and resilience of sanctions regimes. In particular, the European sanctions system against Russia provides an exceptional case for examining how legal design, hybrid regulatory instruments, and compliance-based enforcement interact within a complex policy environment characterised by strategic adaptation, circumvention attempts, and the involvement of a wide range of public and private actors.

Moreover, the unprecedented scale and duration of the sanctions imposed since 2022 have significantly expanded the operational scope of restrictive measures. These measures include financial asset freezes, trade restrictions, technological export controls, transport limitations, and

sector-specific regulatory interventions, all supported by increasingly detailed compliance requirements and monitoring mechanisms (*European Commission, 2025*). Such developments suggest that the effectiveness of the sanctions regime depends not only on the formal adoption of restrictive provisions but also on the institutional capacity to translate legal norms into operational constraints within global economic networks.

Consequently, the contemporary EU sanctions regime against Russia represents not merely a political reaction to geopolitical developments but a complex governance system whose durability and effectiveness depend on the interaction of legal precision, regulatory adaptability, enforcement coordination, and compliance practices. Understanding these structural dimensions is therefore essential for assessing the long-term effectiveness of the sanctions regime and for evaluating the broader role of sanctions as instruments of international governance in an era of prolonged geopolitical confrontation.

Despite the extensive expansion of the European Union's sanctions regime against the Russian Federation since 2022, the analytical assessment of sanctions effectiveness remains conceptually contested within the scholarly literature. A significant part of academic research continues to approach sanctions primarily through relatively narrow analytical frameworks that emphasise either macroeconomic impact, diplomatic signalling, or the capacity of sanctions to coerce behavioural change in the targeted state (*Drezner, 1999*; *Hufbauer et al., 2009*; *Pape, 1997*). While these approaches have contributed substantially to the understanding of economic statecraft, they often rely on simplified causal models that reduce sanctions effectiveness to binary outcomes, typically framed as success or failure in altering the policy behaviour of the sanctioned government.

Such a perspective is increasingly insufficient for analysing contemporary sanctions regimes, particularly in the context of the European Union's restrictive measures against Russia. The sanctions architecture developed since 2022 operates within a far more complex institutional environment than the traditional models of economic sanctions typically assume. It involves multiple layers of legal regulation, administrative coordination among Member States, extensive interpretative guidance issued by European institutions, and a dense network of compliance obligations imposed on financial institutions, corporations, and service providers. As a result, the operational effects of sanctions emerge not solely from formal legal prohibitions but from the broader governance ecosystem within which these prohibitions are implemented and enforced.

In this context, an important analytical challenge arises: existing theoretical frameworks often fail to capture the structural dynamics that determine the durability and operational effectiveness of sanctions regimes over extended periods of geopolitical confrontation. The EU sanctions regime against Russia illustrates how restrictive measures evolve into complex regulatory systems characterised by continuous legal amendments, adaptive policy instruments, and expanding compliance infrastructures (*Council of the European Union, 2018*; *Council of the European Union, 2022*). Consequently, the analytical focus must move beyond the immediate economic effects of sanctions and instead examine the institutional mechanisms that sustain their functionality under conditions of prolonged strategic interaction between sanctioning and targeted actors.

Another dimension of the research problem concerns the growing importance of hybrid regulatory instruments within modern sanctions regimes. Contemporary sanctions frequently combine legal prohibitions, financial supervision, technological export controls, logistical restrictions, and information-sharing mechanisms aimed at countering circumvention networks. These hybrid arrangements blur the traditional boundaries between economic, legal, and

administrative instruments, creating cross-domain policy mechanisms that cannot be adequately explained within conventional sanctions theory. The interaction between legal measures, market behaviour, and private-sector compliance practices therefore becomes a central factor shaping the real-world effectiveness of sanctions.

Furthermore, the operational implementation of sanctions increasingly depends on the capacity of compliance systems to translate regulatory requirements into concrete constraints on financial flows, trade transactions, and service provision. Financial institutions, insurance companies, logistics operators, and multinational corporations act as key intermediaries in the enforcement chain, effectively transforming legal restrictions into practical barriers within global economic networks. This reliance on distributed enforcement structures introduces new governance challenges, including uneven implementation across jurisdictions, risks of excessive or inconsistent compliance practices, and potential tensions between regulatory ambition and administrative feasibility (*European Banking Authority, 2024*).

Taken together, these developments highlight a fundamental research problem: contemporary sanctions regimes, particularly those implemented by the European Union against Russia, cannot be adequately understood through traditional analytical models that focus exclusively on economic pressure or diplomatic coercion. Instead, they must be analysed as complex governance architectures in which legal resilience, hybrid regulatory mechanisms, and compliance capacity jointly determine the long-term effectiveness and stability of the sanctions system. Addressing this analytical gap constitutes a central objective of the study.

The scientific novelty of this study lies in its treatment of the EU sanctions regime against the Russian Federation not as a mere aggregate of restrictive measures or successive sanctions packages, but as an integrated governance architecture whose long-term effectiveness depends on the interaction of several structurally distinct yet mutually reinforcing dimensions. In contrast to a substantial part of the existing literature, which tends to assess sanctions either through macroeconomic impact, coercive capacity, or legal permissibility taken separately (*Drezner, 1999*; *Hufbauer et al., 2009*; *Pape, 1997*; *Voynikov, 2022*), the research develops an analytical model that combines legal resilience, hybridisation of restrictive instruments, and compliance-based operationalisation within a single explanatory framework.

A further element of novelty consists in the conceptualisation of legal resilience as an independent analytical category for the study of sanctions effectiveness. In this article, legal resilience is understood not simply as formal legal validity, but as the capacity of a sanctions regime to preserve clarity, enforceability, interpretative coherence, judicial defensibility, and adaptive update potential under conditions of prolonged geopolitical confrontation and continuous circumvention pressure (*Council of the European Union, 2018*; *Council of the European Union, 2022*; *Lonardo, 2023*). Such an approach allows the analysis to move beyond a static legal reading of restrictive measures and to examine law as a dynamic condition of sanctions durability.

The originality of the study also derives from its emphasis on the hybrid dimension of contemporary sanctions. Rather than treating hybrid measures as an auxiliary or merely descriptive category, the article analyses them as cross-domain regulatory mechanisms in which legal restrictions, logistical constraints, service limitations, financial supervision, and anti-circumvention practices interact to produce cumulative restrictive effects. This perspective makes it possible to explain forms of sanctions pressure that cannot be fully captured either by conventional economic-sanctions theory or by purely doctrinal legal analysis (*Council of the European Union, 2024*; *European Commission, 2025*).

In addition, the article advances the argument that compliance capacity should be regarded not as a purely technical or derivative matter, but as one of the principal determinants of

sanctions effectiveness. By focusing on the role of financial institutions, insurers, exporters, logistics operators, and corporate risk-management systems in translating legal norms into operational constraints, the study offers a more institutionally grounded understanding of how sanctions function in practice within transnational economic networks (*European Banking Authority, 2024*; *van Essen, 2025*). In this sense, compliance is analysed as a core transmission mechanism through which formal regulatory intent becomes material restrictive effect.

Finally, the novelty of the research is strengthened by its forward-looking analytical horizon. Whereas many studies examine sanctions retrospectively or in relation to immediate political outcomes, the present article investigates the conditions of long-term effectiveness of the EU sanctions regime in the medium-term perspective of 2026–2030. This makes it possible to identify not only current strengths of the sanctions architecture, but also the structural risks of erosion, fragmentation, diminishing returns, and regulatory overextension that may affect its future durability. Accordingly, the article contributes to the development of a more comprehensive and policy-relevant scholarly understanding of sanctions as a sustained instrument of European and transnational governance.

The study aims to determine how legal resilience, the hybridisation of restrictive instruments, and compliance capacity shape the long-term effectiveness of the European Union's sanctions regime against the Russian Federation when this regime is understood not as a mere aggregate of restrictive acts, but as an integrated governance architecture. In this context, the article seeks to move beyond simplified interpretations of sanctions as exclusively coercive or exclusively economic instruments and instead to analyse them as a complex regulatory system operating through the interaction of law, administration, market behaviour, and distributed enforcement structures (*Council of the European Union, 2018*; *Council of the European Union, 2022*; *European Commission, 2025*).

More specifically, the study aims to reveal the structural conditions under which the EU sanctions regime preserves its operational force over time despite legal contestation, adaptive circumvention, and the increasing complexity of cross-border economic relations. In doing so, the article focuses on the internal properties of the sanctions architecture itself: the quality of legal drafting, the capacity for interpretative and regulatory adjustment, the role of hybrid anti-circumvention mechanisms, and the practical translation of formal restrictions into operative constraints through compliance systems (*European Banking Authority, 2024*; *Lonardo, 2023*).

At the conceptual level, the study aims to contribute to sanctions scholarship by proposing an analytical framework that integrates legal, institutional, and operational dimensions of sanctions effectiveness within a single explanatory model. At the applied level, it seeks to identify those characteristics of the EU sanctions regime that are most significant for its durability, adaptability, and regulatory coherence in the medium-term horizon of 2026–2030. In this sense, the article is intended not only to clarify the theoretical nature of the contemporary EU sanctions regime, but also to provide a grounded basis for evaluating its future development as an instrument of European and transnational governance.

According to the stated purpose of the study, the article is guided by a set of interrelated research questions intended to clarify the institutional, legal, and operational foundations of the EU sanctions regime against the Russian Federation. These questions are formulated on the premise that the contemporary sanctions framework should be analysed not merely as a collection of restrictive acts, but as a complex governance architecture whose effectiveness depends on the interaction of regulatory design, adaptive implementation, and distributed enforcement mechanisms.

The central research question of the article is as follows: how do legal resilience, the hybridisation of restrictive instruments, and compliance capacity determine the long-term effectiveness of the European Union's sanctions regime against the Russian Federation?

This general question is further specified through several subsidiary research questions.

1. For what reasons should the EU sanctions regime against Russia be conceptualised as an integrated governance architecture rather than as a sum of individual sanctions packages or isolated restrictive measures? This question is necessary because the cumulative and cross-sectoral character of the sanctions system suggests the presence of a more complex institutional structure than is commonly captured by conventional sanctions analysis (*Council of the European Union, 2018*; *Council of the European Union, 2022*).
2. Which legal characteristics constitute the resilience of a sanctions regime under conditions of prolonged geopolitical confrontation? Here the article examines whether such elements as normative clarity, drafting precision, derogation design, judicial defensibility, interpretative coherence, and update capacity may be treated as core determinants of sanctions durability and enforceability (*Council of the European Union, 2022*; *Lonardo, 2023*).
3. Thirdly, under what conditions do restrictive measures acquire a genuinely hybrid character, and how does such hybridisation affect the operational strength of the sanctions regime? This question addresses the growing significance of cross-domain instruments in which legal restrictions, logistical limitations, service denial, financial supervision, and anti-circumvention mechanisms interact in ways that exceed the boundaries of classical sectoral classifications (*Council of the European Union, 2024*; *European Commission, 2025*).
4. Fourthly, why should compliance capacity be regarded as a substantive determinant of sanctions effectiveness rather than as a merely technical or secondary aspect of implementation? This question reflects the increasing dependence of sanctions enforcement on financial institutions, exporters, insurers, logistics operators, and corporate risk-management systems that transform legal requirements into practical barriers within transnational economic networks (*European Banking Authority, 2024*; *van Essen, 2025*).
5. Finally, which structural conditions are most likely to preserve or undermine the long-term effectiveness of the EU sanctions regime in the medium-term perspective of 2026–2030? This question is particularly important in view of the fact that, at a mature stage of sanctions development, the key issue is no longer limited to the formal expansion of restrictive packages but increasingly concerns regulatory maintenance, anti-circumvention adaptation, proportionality, administrative manageability, and strategic recalibration (*Council of the European Union, 2025a*; *Council of the European Union, 2025b*; *European Commission, 2026*).

Taken together, these research questions provide the conceptual framework for the article and establish the basis for a multidimensional assessment of sanctions effectiveness. They also ensure that the study remains focused not on a binary judgement of success or failure, but on the deeper structural mechanisms through which the sanctions regime acquires, preserves, or loses its long-term operational force.

The working hypothesis of this study is that the long-term effectiveness of the European Union's sanctions regime against the Russian Federation is determined less by the formal accumulation of restrictive measures than by the institutional quality of the sanctions architecture within which those measures operate. More precisely, the article proceeds from the assumption that sanctions retain operational force over an extended period only when they are supported by three interdependent conditions: legal resilience, hybrid adaptability, and compliance-based operational capacity.

At the first level, it is hypothesised that the effectiveness and durability of the sanctions regime depend on the degree of its legal resilience. This means that sanctions are expected to function more consistently when the relevant legal framework demonstrates clarity of formulation, precision of drafting, interpretative coherence, judicial defensibility, and the capacity for timely regulatory adjustment in response to new patterns of circumvention and strategic adaptation (*Council of the European Union, 2018*; *Council of the European Union, 2022*; *Lonardo, 2023*). Conversely, legal ambiguity, fragmented interpretation, or insufficient update capacity are expected to weaken the operational consistency of the regime and to increase the risks of uneven enforcement and legal contestation.

At the second level, the study hypothesises that the long-term strength of the sanctions regime increases when restrictive measures acquire a genuinely hybrid character. In this context, hybridisation is understood as the integration of legal restrictions with financial controls, logistical limitations, service denials, anti-circumvention instruments, and other cross-domain mechanisms that together produce cumulative restrictive effects exceeding the impact of isolated measures. Accordingly, the hypothesis assumes that the sanctions regime is more resilient and strategically effective when it is capable of acting not only through direct prohibition but also through the disruption of enabling infrastructures and adaptive circumvention networks (*Council of the European Union, 2024*; *European Commission, 2025*).

At the third level, the article proceeds from the hypothesis that compliance capacity constitutes one of the decisive variables of sanctions effectiveness. The practical force of sanctions is assumed to depend not merely on the adoption of legal norms, but on the ability of financial institutions, insurers, exporters, logistics operators, and corporate compliance systems to translate those norms into concrete operational constraints within transnational economic relations (*European Banking Authority, 2024*; *van Essen, 2025*). On this basis, the study assumes that even formally robust sanctions may produce limited practical effect where compliance chains are inconsistent, weakly coordinated, or excessively fragmented across jurisdictions and sectors.

Taken together, these assumptions support the central hypothesis of the article: the EU sanctions regime against Russia is most likely to remain effective in the medium-term horizon of 2026–2030 when its legal structure is resilient, its restrictive instruments are hybridly integrated, and its implementation is sustained by a sufficiently developed and coordinated compliance architecture. By contrast, the erosion of any of these three components is expected to reduce the overall durability, coherence, and real-world effect of the sanctions system.

The results of the study are intended for several categories of academic, professional, and policy-oriented audiences whose work is connected with the analysis, design, or implementation of sanctions regimes and international regulatory governance.

First, the study is addressed to scholars and researchers working in the fields of international relations, European studies, international economic law, and political economy of sanctions. For this academic audience, the article offers a conceptual framework that integrates legal, institutional, and operational dimensions of sanctions effectiveness within a single analytical model. By emphasising the interaction between legal resilience, hybrid regulatory mechanisms, and compliance infrastructures, the study contributes to the development of a more comprehensive theoretical understanding of contemporary sanctions regimes as instruments of transnational governance (*Drezner, 1999*; *Hufbauer et al., 2009*; *Portela, 2010*).

Secondly, the findings of the research are relevant for policy analysts and institutional experts involved in the design, evaluation, and refinement of restrictive measures within the European Union and partner jurisdictions. The analysis of the structural properties of the EU sanctions regime provides insights into the institutional factors that influence the durability,

coherence, and adaptability of sanctions frameworks. In particular, the study highlights the importance of legal drafting precision, interpretative consistency, and coordinated enforcement mechanisms for maintaining the operational effectiveness of sanctions over extended periods of geopolitical confrontation (*Council of the European Union, 2018*; *Council of the European Union, 2022*).

Thirdly, the results may be useful for legal practitioners and compliance professionals operating within financial institutions, multinational corporations, export-control authorities, and regulatory bodies responsible for the practical implementation of sanctions policy. As sanctions increasingly rely on distributed enforcement structures, the role of compliance systems in translating legal provisions into operational constraints has become central to the functioning of the sanctions regime. The article therefore provides a conceptual perspective that may assist practitioners in understanding the broader institutional context within which compliance obligations are embedded (*European Banking Authority, 2024*; *van Essen, 2025*).

Finally, the research is also relevant for strategic policy planners and analysts concerned with the long-term development of sanctions as instruments of international governance. By examining the structural conditions that may preserve or undermine the effectiveness of the EU sanctions regime in the medium-term horizon of 2026–2030, the study contributes to a deeper understanding of how sanctions systems evolve over time and how they may be recalibrated in response to changing geopolitical, economic, and regulatory environments (*Council of the European Union, 2025a*; *European Commission, 2025*).

In this way, the article seeks to bridge academic analysis and applied policy reflection, offering insights that are theoretically grounded yet directly relevant to contemporary debates on the governance, implementation, and strategic sustainability of international sanctions regimes.

The structure of the article is determined by the stated aim, research questions, and working hypothesis, and is designed to ensure a consistent transition from the formulation of the theoretical problem to the analytical evaluation of the EU sanctions regime against the Russian Federation as an integrated governance architecture.

Following the Introduction, the article proceeds to a literature review, which examines the principal academic approaches to sanctions effectiveness, sanctions as instruments of governance, legal resilience, hybrid restrictive measures, and compliance-based enforcement. This section is intended to identify the main conceptual and methodological limitations of the existing scholarship and to substantiate the analytical position adopted in the study (*Drezner, 1999*; *Hufbauer et al., 2009*; *Portela, 2010*).

The Methods presents the methodological framework of the research. It outlines the use of institutional and legal analysis, political economy analysis, comparative-historical interpretation, and public policy effectiveness analysis as complementary methods for examining the long-term functioning of the sanctions regime. Particular attention is devoted to the justification of a multidimensional approach to sanctions effectiveness, which avoids reducing the analysis to a simple binary judgement of success or failure.

The core of the article is then organised into several substantive analytical sections. First, the EU sanctions regime is examined as an integrated governance architecture, with emphasis on its cumulative, cross-sectoral, and institutionally layered character. Secondly, the article analyses legal resilience as a condition of long-term sanctions effectiveness, focusing on such variables as legal precision, interpretative coherence, judicial defensibility, derogation design, and update capacity (*Council of the European Union, 2018*; *Council of the European Union, 2022*; *Lonardo, 2023*). Thirdly, the study considers the hybridisation of restrictive instruments, demonstrating how legal restrictions, anti-circumvention mechanisms, financial controls, service limitations,

and logistical constraints interact within cross-domain systems of pressure (*Council of the European Union, 2024*; *European Commission, 2025*).

A separate section is devoted to compliance as the operational transmission mechanism of sanctions. Here the article examines how banks, insurers, exporters, logistics operators, and corporate compliance structures transform formal legal obligations into practical restrictions within transnational economic relations. This is followed by a section addressing the structural limits and governance risks of the sanctions regime, including regulatory complexity, uneven enforcement, over-compliance, adaptation by sanctioned actors, and the possibility of diminishing returns (*European Banking Authority, 2024*; *van Essen, 2025*).

The penultimate analytical section develops a forward-looking perspective for 2026–2030, identifying the principal conditions of durability, erosion risks, and recalibration triggers that are likely to shape the future effectiveness of the EU sanctions regime. Finally, the article concludes by synthesising the results of the study, confirming or revising the working hypothesis, and formulating general theoretical and practical conclusions regarding the role of legal resilience, hybrid adaptability, and compliance capacity in sustaining the operational force of sanctions over time.

Thus, the article is structured so as to combine conceptual clarity, methodological consistency, and applied analytical relevance, while maintaining a coherent scientific argument throughout all sections of the study.

Methods

The study adopts a qualitative analytical research design aimed at examining the European Union's sanctions regime against the Russian Federation as a complex institutional system rather than as a collection of isolated restrictive measures. The methodological approach is based on the premise that contemporary sanctions regimes operate within multi-layered governance environments in which legal norms, administrative procedures, economic incentives, and compliance practices interact to produce cumulative regulatory effects. Consequently, the analysis is structured in a way that allows the investigation of sanctions as an integrated governance architecture whose effectiveness depends on the interaction of institutional design, regulatory instruments, and operational enforcement mechanisms.

The research design combines several complementary analytical perspectives. At its core lies an institutional and regulatory analysis of the EU sanctions framework, focusing on the structure and evolution of restrictive measures adopted in response to Russia's actions destabilising Ukraine. Particular attention is given to the legal and administrative mechanisms through which sanctions are formulated, interpreted, implemented, and periodically amended within the European Union's regulatory system (*Council of the European Union, 2018*; *Council of the European Union, 2022*). This approach allows the study to examine sanctions not only as legal acts but also as components of a broader governance system involving multiple institutions and enforcement actors.

In addition, the research design incorporates elements of political economy analysis in order to explore how sanctions influence the behaviour of economic actors within international markets. This dimension is essential because sanctions do not operate solely through formal prohibitions; they also affect incentives, transaction costs, reputational risks, and strategic decision-making among financial institutions, corporations, and logistics operators. The analysis therefore considers the interaction between legal restrictions and market behaviour as an important determinant of the operational effectiveness of the sanctions regime (*Drezner, 1999*; *Hufbauer et al., 2009*).

Another component of the research design involves a governance-oriented perspective that examines the role of compliance infrastructures in the implementation of sanctions policy. Contemporary sanctions increasingly rely on distributed enforcement mechanisms in which regulatory authorities, financial institutions, and private-sector entities participate in monitoring, screening, and risk assessment processes. The functioning of these compliance systems plays a decisive role in translating formal legal provisions into practical restrictions within global economic networks (*European Banking Authority, 2024*).

Finally, the research design incorporates a forward-looking analytical dimension aimed at assessing the structural conditions that may influence the long-term effectiveness of the sanctions regime. Instead of limiting the analysis to retrospective evaluation, the study also considers potential developments in the medium-term horizon of 2026–2030. This approach makes it possible to identify both the factors that may sustain the durability of the sanctions architecture and the structural risks that may undermine its effectiveness, including regulatory complexity, enforcement asymmetry, and adaptive circumvention strategies.

Taken together, this methodological design provides a comprehensive framework for analysing the EU sanctions regime as a dynamic regulatory system whose effectiveness depends on the interaction of legal structure, institutional coordination, hybrid regulatory instruments, and compliance-based enforcement mechanisms.

An important component of the methodological framework of this study is the application of political economy analysis, which enables the examination of sanctions not only as legal or diplomatic instruments but also as mechanisms that reshape economic incentives, resource allocation, and strategic behaviour within international markets. This approach is particularly relevant for analysing the EU sanctions regime against the Russian Federation, since the operational effects of sanctions extend far beyond the formal legal sphere and significantly influence the behaviour of financial institutions, corporations, and transnational supply chains.

Within the political economy perspective, sanctions are understood as instruments of economic statecraft that operate through the modification of incentive structures and transaction conditions in international economic relations (*Drezner, 1999*). By restricting access to financial services, advanced technologies, transport infrastructures, and specialised services, sanctions increase the economic costs associated with certain forms of economic activity and thereby influence the strategic decisions of both state and non-state actors. The analytical value of this approach lies in its ability to capture the indirect and cumulative effects of sanctions, which often manifest through shifts in investment patterns, trade flows, financial risk assessment, and corporate governance practices.

Political economy analysis is also essential for understanding the interaction between sanctions and the adaptive behaviour of targeted economies. In the case of Russia, the introduction of EU restrictive measures has triggered a variety of economic adjustment strategies, including the reconfiguration of trade routes, the search for alternative financial channels, the development of substitute supply chains, and the establishment of intermediary networks designed to mitigate the impact of sanctions. Such adaptive responses illustrate that sanctions regimes operate within dynamic environments in which both sanctioning and targeted actors continuously adjust their strategies in response to evolving regulatory and economic conditions.

Another dimension of political economy analysis concerns the role of market actors as intermediaries in the implementation of sanctions policy. Financial institutions, multinational corporations, insurance providers, and logistics companies participate in the operational enforcement of sanctions by incorporating regulatory restrictions into their internal risk

management and compliance procedures. As a result, market behaviour becomes an important transmission mechanism through which sanctions influence economic activity at the global level. The interaction between public regulatory frameworks and private-sector decision-making therefore constitutes a key element of the sanctions governance system.

Moreover, the political economy perspective allows the study to address one of the central debates in sanctions research: the relationship between economic pressure and political outcomes. Traditional scholarship has frequently assessed sanctions primarily through their macroeconomic impact on the targeted state (*Hufbauer et al., 2009*; *Pape, 1997*). However, more recent research suggests that the effectiveness of sanctions cannot be fully explained by economic losses alone, as the political consequences of sanctions often depend on the broader institutional and governance environment in which economic pressure is applied. In this sense, political economy analysis complements legal and institutional approaches by illuminating the channels through which sanctions influence economic structures, strategic incentives, and adaptive capacities.

By incorporating political economy analysis into the methodological framework, the study is able to examine the EU sanctions regime not merely as a set of legal restrictions but as a complex system of economic and regulatory interactions. This perspective is particularly important for understanding how sanctions generate cumulative pressure through changes in market behaviour, resource distribution, and strategic adaptation, thereby contributing to the overall governance architecture of the sanctions regime.

A central methodological component of the study is institutional and legal analysis, which is employed to examine the structural characteristics of the European Union's sanctions regime as a regulatory framework embedded within the legal order of the EU. This approach allows the study to analyse sanctions not only as political instruments of foreign policy but also as legal mechanisms operating within a complex institutional environment defined by legislative acts, administrative procedures, judicial oversight, and coordinated enforcement practices.

Institutional and legal analysis focuses primarily on the normative architecture of EU restrictive measures, including the legal acts through which sanctions are established, interpreted, amended, and implemented across the Member States. In the case of sanctions against the Russian Federation, the core regulatory framework is constituted by a series of Council regulations and decisions adopted within the framework of the Common Foreign and Security Policy and implemented through binding legal instruments applicable within the EU legal order (*Council of the European Union, 2014a*; *Council of the European Union, 2014b*). These acts form the legal foundation of the sanctions regime and determine the scope of prohibitions, the categories of restricted activities, and the obligations imposed on economic operators and financial institutions.

From an institutional perspective, the analysis also considers the role of various European bodies and national authorities involved in the administration and enforcement of sanctions. The sanctions regime functions through a multi-level governance structure, in which EU institutions adopt the legal framework, while national authorities are responsible for its implementation, supervision, and enforcement within their respective jurisdictions. This distributed enforcement structure makes institutional coordination and interpretative consistency particularly important for maintaining the coherence and operational effectiveness of the sanctions system (*Council of the European Union, 2018*; *Council of the European Union, 2022*).

Within this framework, institutional and legal analysis is also used to examine the concept of legal resilience, which constitutes one of the key analytical categories of the study. Legal resilience refers to the ability of a sanctions regime to maintain enforceability and interpretative

stability over time despite evolving political circumstances, adaptive circumvention strategies, and potential legal challenges. In practical terms, this involves evaluating such elements as the precision of legal drafting, the clarity of regulatory definitions, the design of derogations and exemptions, the availability of interpretative guidance, and the capacity of the legal framework to be updated in response to new forms of circumvention or regulatory gaps (*Lonardo, 2023*).

Furthermore, the institutional and legal approach allows the study to analyse the interaction between sanctions law and judicial review mechanisms within the EU legal system. The possibility of legal challenges before European courts introduces an additional dimension of regulatory accountability and requires that sanctions measures maintain a sufficient degree of legal certainty and proportionality. Judicial scrutiny therefore constitutes an important factor influencing both the design and the long-term sustainability of sanctions regimes.

In addition to examining the formal legal framework, institutional analysis also addresses the administrative practices and interpretative instruments that accompany the implementation of sanctions. These include guidance documents, explanatory notes, and best-practice recommendations issued by European institutions in order to facilitate consistent application of restrictive measures across Member States and economic sectors. Such instruments play a crucial role in reducing interpretative uncertainty and strengthening the practical enforceability of the sanctions regime.

By integrating institutional and legal analysis into the methodological framework, the study is able to examine sanctions as a regulatory system characterised by a combination of legal norms, institutional coordination, and administrative practice. This perspective makes it possible to assess how the internal legal structure of the EU sanctions regime contributes to its resilience, coherence, and operational effectiveness within the broader governance architecture of contemporary international sanctions policy.

In addition to institutional and political economy analysis, the methodological framework of this study incorporates a comparative-historical approach, which enables the examination of the EU sanctions regime against the Russian Federation within a broader temporal and structural context. This approach is particularly relevant for understanding sanctions regimes as evolving policy systems rather than static regulatory constructs. By analysing the development of sanctions over time, the study is able to identify patterns of institutional adaptation, regulatory refinement, and strategic adjustment that influence the long-term effectiveness of restrictive measures.

The comparative-historical perspective is based on the premise that sanctions regimes develop through cumulative institutional processes involving successive regulatory amendments, policy recalibrations, and responses to circumvention strategies. In the case of the European Union, restrictive measures against Russia have evolved from earlier sanctions introduced in response to the 2014 annexation of Crimea into a far more extensive and complex regulatory framework following the large-scale invasion of Ukraine in 2022 (*Council of the European Union, 2014a*; *Council of the European Union, 2014b*; *European Commission, 2025*). This transformation illustrates how sanctions regimes can expand from targeted measures affecting specific individuals and sectors into comprehensive governance systems covering financial markets, technological transfers, transport infrastructures, and energy trade.

From a methodological standpoint, the comparative-historical approach allows the study to analyse the evolutionary trajectory of the sanctions regime, including the transition from initial restrictive actions to the establishment of a multi-layered sanctions architecture characterised by increasing regulatory density and operational complexity. Such an approach helps to reveal the

mechanisms through which sanctions policies adapt to changing geopolitical conditions, economic environments, and patterns of circumvention.

The historical dimension is complemented by a comparative perspective that situates the EU sanctions regime within the broader landscape of international sanctions policy. While the present article focuses primarily on the European Union, the comparative-historical method acknowledges that sanctions regimes often operate within coordinated frameworks involving partner jurisdictions and international organisations. Cooperation between the EU, the G7 countries, and other aligned partners has contributed to the development of coordinated measures such as financial restrictions, trade controls, and price cap mechanisms affecting Russian energy exports (*European Commission, 2025*; *Stockbruegger, 2023*). This international coordination highlights the transnational nature of contemporary sanctions governance and the importance of policy alignment for maintaining the effectiveness of restrictive measures.

Moreover, the comparative-historical approach makes it possible to analyse the adaptive interaction between sanctioning and targeted actors over time. Sanctions regimes rarely produce static effects; instead, they generate dynamic processes in which targeted states, economic actors, and intermediary networks attempt to mitigate or circumvent regulatory constraints. In response, sanctioning authorities often introduce additional measures designed to close loopholes, strengthen enforcement, or address newly emerging circumvention practices. The resulting process can be described as a regulatory cycle characterised by successive rounds of restriction and adaptation.

By examining the sanctions regime through this comparative-historical lens, the study is able to identify the structural features that contribute to the durability and adaptability of sanctions governance. This perspective highlights that the effectiveness of sanctions cannot be assessed solely through short-term outcomes but must instead be evaluated in relation to the long-term institutional evolution of the sanctions framework and its capacity to respond to changing political, economic, and regulatory conditions.

Another important methodological component of the present research is public policy effectiveness analysis, which is applied in order to evaluate the sanctions regime as a policy instrument operating within a complex regulatory and geopolitical environment. This approach allows the study to assess sanctions not merely as legal prohibitions or economic restrictions, but as elements of a broader policy system aimed at influencing behaviour, constraining resources, and maintaining political coordination among sanctioning actors.

Within the framework of public policy analysis, sanctions are treated as policy tools designed to achieve multiple objectives simultaneously, including coercion, deterrence, signalling, and coalition governance. Consequently, the effectiveness of sanctions cannot be reduced to a single indicator, such as the immediate economic impact on the targeted state. Instead, a multidimensional analytical framework is required to capture the various channels through which sanctions may influence political and economic processes. This perspective is consistent with contemporary research in the field of economic statecraft, which emphasises the need to evaluate sanctions across several dimensions of policy outcomes rather than through a binary success–failure dichotomy (*Drezner, 1999*; *Hufbauer et al., 2009*).

In the study, public policy effectiveness analysis is structured around several analytical dimensions that reflect the diverse functions of sanctions regimes. The first dimension concerns the coercive effect of sanctions, which refers to the potential of restrictive measures to influence the strategic behaviour of the targeted state by increasing the economic and political costs associated with certain policy choices. The second dimension relates to the degradational effect,

understood as the capacity of sanctions to weaken economic sectors, technological capabilities, or financial resources that are essential for sustaining strategic activities.

A third dimension involves the deterrent function of sanctions, which operates not only with respect to the targeted state but also with regard to other international actors that may observe the consequences of sanctions violations. In this sense, sanctions may reinforce international norms by demonstrating the willingness of sanctioning actors to impose tangible costs in response to perceived violations of international law or security arrangements.

The fourth analytical dimension concerns the coordinative function of sanctions regimes. Sanctions frequently serve as instruments for maintaining political cohesion among coalitions of states that share similar strategic objectives. Through coordinated restrictive measures, sanctioning actors signal collective commitment to common policies and reinforce institutional cooperation among participating jurisdictions. In the case of the EU sanctions regime against Russia, coordination with partner countries and international organisations has played a crucial role in amplifying the reach and consistency of restrictive measures (*European Commission, 2025*).

Finally, public policy effectiveness analysis also considers the legitimising dimension of sanctions. Sanctions can function as normative instruments that reaffirm international legal principles and political commitments, thereby contributing to the legitimacy of the sanctioning coalition and its policy objectives. In the context of the European Union, restrictive measures are often framed as part of a broader strategy aimed at defending international law, territorial integrity, and the rules-based international order (*Council of the European Union, 2018*).

By employing public policy effectiveness analysis, the study is able to evaluate the sanctions regime through a multidimensional analytical lens that captures its various political, economic, and normative functions. This approach makes it possible to move beyond simplified evaluations of sanctions outcomes and instead to assess the broader governance role of sanctions within contemporary international policy frameworks.

The empirical and analytical basis of the present research consists of a diverse set of legal, institutional, and academic sources that together enable a comprehensive examination of the European Union's sanctions regime against Russia. Given the complexity of contemporary sanctions governance, the study relies on a multi-source approach combining primary legal documents, official institutional materials, and peer-reviewed academic literature.

The first category of sources includes primary legal acts of the European Union that establish the normative framework of the sanctions regime. These documents form the legal foundation for the restrictive measures adopted by the EU and define the scope of prohibitions, the categories of targeted persons and entities, and the regulatory obligations imposed on economic operators. Among the most important instruments in this regard are Council Regulation (EU) No 269/2014 concerning restrictive measures against individuals and entities responsible for undermining Ukraine's territorial integrity, and Council Regulation (EU) No 833/2014 concerning sectoral economic restrictions against Russia (*Council of the European Union, 2014a*; *Council of the European Union, 2014b*). Subsequent amendments and implementing regulations are also considered as part of the evolving regulatory structure of the sanctions regime.

The second category of sources consists of institutional and administrative materials issued by EU bodies and regulatory authorities. These include implementation guidelines, interpretative communications, and compliance-related documents designed to facilitate the consistent application of sanctions across Member States and economic sectors. Such materials provide valuable insight into the operational dimension of sanctions governance, including the practical mechanisms through which restrictive measures are interpreted and enforced (*Council of the*

European Union, 2018; *Council of the European Union, 2022*; *European Banking Authority, 2024*; *European Commission, 2025*).

A third group of sources comprises analytical and policy-oriented publications produced by European institutions and international organisations. These materials often contain detailed explanations of sanctions policy objectives, implementation practices, and coordination mechanisms with partner jurisdictions. They are particularly useful for understanding the broader governance context within which the EU sanctions regime operates.

In addition to institutional sources, the research draws extensively on peer-reviewed academic literature addressing sanctions effectiveness, economic statecraft, compliance systems, and the legal aspects of restrictive measures. Foundational works in sanctions scholarship provide theoretical frameworks for understanding the political and economic dynamics of sanctions regimes (*Drezner, 1999*; *Hufbauer et al., 2009*; *Pape, 1997*). More recent academic studies focusing on EU sanctions law, judicial review, and compliance practices contribute to the analysis of the institutional and legal characteristics of the contemporary sanctions architecture (*Lonardo, 2023*; *van Essen, 2025*).

The integration of these different categories of sources allows the study to combine normative analysis, institutional interpretation, and theoretical reflection within a unified methodological framework. Such triangulation of sources enhances the reliability of the research findings and helps to ensure that the analysis captures both the formal legal structure and the practical functioning of the sanctions regime.

At the same time, particular attention is given to maintaining a critical approach to the available data. Given the political sensitivity of sanctions policy and the complexity of measuring their economic and strategic effects, the study avoids reliance on single-source interpretations and instead seeks to corroborate analytical conclusions through the comparison of multiple types of evidence. This methodological caution contributes to a more balanced and academically robust evaluation of the EU sanctions regime and its operational effectiveness.

Despite the comprehensive methodological framework employed in this research, several limitations must be acknowledged in order to maintain analytical transparency and methodological rigour. These limitations arise primarily from the complexity of sanctions regimes as policy instruments, the evolving nature of the EU sanctions framework, and the inherent challenges associated with measuring the effectiveness of restrictive measures in a dynamic international environment.

First, one of the principal limitations concerns the difficulty of isolating the causal impact of sanctions from other political, economic, and geopolitical factors that may influence the behaviour of the targeted state. Sanctions rarely operate in isolation; rather, they function alongside diplomatic initiatives, military developments, domestic political dynamics, and broader changes in the global economic environment. As a result, establishing a direct causal relationship between sanctions and specific political outcomes may be analytically challenging. This limitation has been widely recognised in sanctions scholarship, where debates continue regarding the appropriate criteria for evaluating sanctions effectiveness (*Drezner, 1999*; *Hufbauer et al., 2009*; *Pape, 1997*).

Secondly, the study is subject to limitations related to the availability and reliability of empirical data, particularly in relation to the economic effects of sanctions and the extent of circumvention activities. Information concerning financial flows, intermediary networks, and alternative trade routes is often incomplete, confidential, or subject to political interpretation. Consequently, empirical observations regarding adaptation strategies or circumvention mechanisms must be treated with caution and interpreted within a broader analytical context.

A further limitation arises from the distributed and multi-level nature of sanctions enforcement within the European Union. While the EU establishes the legal framework for restrictive measures, their practical implementation depends largely on national authorities and private-sector actors operating within different regulatory and administrative environments. This institutional diversity may result in variations in enforcement practices, compliance capacity, and interpretative approaches across Member States (*Council of the European Union, 2018*; *European Banking Authority, 2024*). Such variations can complicate attempts to assess the overall effectiveness of the sanctions regime in a uniform manner.

Another limitation relates to the dynamic character of sanctions regimes, which evolve through successive regulatory amendments and policy adjustments. The EU sanctions framework against Russia has undergone numerous revisions since 2022, reflecting ongoing efforts to close regulatory loopholes, address circumvention practices, and adapt to changing geopolitical circumstances. As a result, any analysis of the sanctions regime represents a snapshot within a continually evolving regulatory landscape. Conclusions drawn in the study must therefore be understood as provisional and subject to revision as new measures and institutional practices emerge.

Finally, the forward-looking component of the study, which considers the potential development of the sanctions regime in the medium-term horizon of 2026–2030, necessarily involves a degree of analytical projection and interpretative judgement. While the analysis is grounded in existing institutional trends and regulatory practices, the future evolution of sanctions governance will ultimately depend on political decisions, international developments, and economic conditions that cannot be predicted with complete certainty.

Acknowledging these limitations does not diminish the analytical value of the research. On the contrary, recognising the methodological constraints associated with sanctions analysis contributes to a more balanced and academically responsible interpretation of the findings. By situating the study within these limitations, the article seeks to provide a rigorous yet cautious evaluation of the structural properties and long-term prospects of the EU sanctions regime against the Russian Federation.

Literature Review

The question of sanctions effectiveness has long occupied a central place in the scholarly literature on international relations and economic statecraft. Classical approaches to sanctions analysis emerged primarily during the second half of the twentieth century and sought to determine whether economic pressure could successfully influence the political behaviour of targeted states. Within this tradition, sanctions were typically conceptualised as instruments of coercive diplomacy, intended to alter the policy choices of governments by imposing economic costs or restricting access to international markets and financial systems.

One of the most influential early contributions to the study of sanctions effectiveness is the work of Hufbauer, Schott, Elliott, and Oegg (*2009*), whose extensive empirical dataset on historical sanctions episodes became a foundational reference for sanctions research. Their analysis suggests that sanctions may achieve partial or full success under certain conditions, particularly when the economic costs imposed on the target state are significant and when the objectives of the sanctioning coalition remain relatively limited and clearly defined. This empirical approach emphasises the importance of measurable economic pressure as a primary mechanism through which sanctions influence political outcomes.

In contrast, other scholars have expressed scepticism regarding the effectiveness of sanctions as instruments of coercion. Pape (*1997*), for instance, argues that many cases

previously classified as successful sanctions episodes were in fact misinterpreted, and that economic sanctions rarely compel states to change fundamental policy decisions. According to this perspective, sanctions tend to produce limited political results because governments often possess alternative sources of economic support or are able to mobilise domestic political resilience in response to external pressure.

A related line of scholarship focuses on sanctions within the broader framework of economic statecraft, emphasising the strategic interaction between sanctioning and targeted states. Drezner (*1999*) argues that sanctions effectiveness depends significantly on the expectations and strategic calculations of political actors, particularly with regard to credibility, reputation, and the anticipated duration of sanctions pressure. From this viewpoint, sanctions function not only as instruments of economic restriction but also as signals of political resolve within international bargaining processes.

Another important dimension of classical sanctions scholarship concerns the role of coalition dynamics in shaping sanctions outcomes. Studies have shown that sanctions imposed by broad international coalitions tend to be more effective than unilateral measures because they reduce opportunities for the targeted state to circumvent restrictions through alternative trading partners. At the same time, coalition-based sanctions may face coordination challenges, as participating states may differ in their economic interests, political priorities, or willingness to sustain long-term pressure.

While these classical approaches have significantly advanced the understanding of sanctions as instruments of international policy, they also exhibit several analytical limitations. Many traditional studies focus primarily on the macroeconomic impact of sanctions or on their ability to produce immediate policy concessions from the targeted state. As a result, less attention has been paid to the institutional and regulatory dimensions of sanctions regimes, including the legal design of restrictive measures, the administrative mechanisms of enforcement, and the role of compliance infrastructures in translating legal prohibitions into operational constraints.

In the contemporary context, particularly in relation to the EU sanctions regime against Russia, these limitations have become increasingly evident. Modern sanctions frameworks operate within complex institutional environments involving legal regulations, financial supervision, technological controls, and private-sector compliance systems. Consequently, evaluating sanctions effectiveness requires analytical tools that extend beyond the classical focus on economic pressure and instead consider sanctions as evolving governance systems embedded in broader regulatory and institutional structures.

Thus, while classical sanctions scholarship provides an essential theoretical foundation for understanding the basic mechanisms of economic statecraft, it also highlights the need for more comprehensive analytical frameworks capable of capturing the multidimensional character of contemporary sanctions regimes. The study builds upon these classical insights while seeking to extend them through a broader examination of legal resilience, hybrid regulatory instruments, and compliance-based enforcement within the EU sanctions architecture.

In more recent scholarly discussions, sanctions have increasingly been analysed not only as tools of coercive diplomacy but also as elements of broader systems of international and transnational governance. This shift reflects the growing institutional complexity of modern sanctions regimes, which frequently involve extensive legal frameworks, regulatory coordination among multiple jurisdictions, and the participation of private-sector actors in the enforcement process. As a result, sanctions are increasingly understood as regulatory mechanisms that shape behaviour within international economic networks rather than solely as instruments intended to compel policy change in targeted states.

Within this governance-oriented perspective, sanctions regimes are interpreted as institutionalised policy systems embedded in legal and administrative structures. Portela (2010), for example, emphasises that the effectiveness of European Union sanctions depends significantly on institutional factors such as decision-making procedures, legal coherence, and coordination among Member States. In this view, sanctions should be analysed not simply through their economic impact but through the organisational capacity of the sanctioning system to design, implement, and maintain restrictive measures over time.

The governance approach also highlights the importance of regulatory infrastructure in shaping sanctions outcomes. Contemporary sanctions regimes rely on complex networks of legal norms, administrative guidance, monitoring systems, and compliance procedures that collectively form the operational environment within which sanctions function. These regulatory mechanisms are particularly evident in the case of the European Union, where sanctions are implemented through binding regulations accompanied by interpretative guidelines, enforcement recommendations, and coordination among national authorities (*Council of the European Union, 2018*; *Council of the European Union, 2022*).

Another important feature of sanctions as governance mechanisms is the role of distributed enforcement structures. Unlike traditional forms of state coercion, sanctions often depend on the active participation of private actors, including financial institutions, multinational corporations, insurance companies, and logistics providers. These actors implement sanctions in practice by incorporating regulatory requirements into internal risk management, due diligence procedures, and transaction monitoring systems. As a consequence, the operational effectiveness of sanctions increasingly depends on the interaction between public regulatory authorities and private compliance infrastructures.

The governance perspective further emphasises the cumulative and adaptive nature of sanctions regimes. Rather than remaining static sets of legal prohibitions, sanctions systems often evolve through successive amendments and policy adjustments designed to address emerging challenges such as regulatory loopholes or circumvention strategies. This process creates a dynamic regulatory environment in which sanctions measures interact with broader economic and political developments. In the context of EU sanctions against Russia, this dynamic is reflected in the continuous expansion and refinement of restrictive measures, including additional financial restrictions, export controls, and anti-circumvention mechanisms introduced after 2022 (*European Commission, 2025*).

Furthermore, the governance-oriented interpretation of sanctions recognises that sanctions may serve functions beyond immediate economic pressure. In addition to their coercive objectives, sanctions can contribute to norm enforcement, coalition coordination, and institutional signalling within the international system. Through coordinated restrictive measures, sanctioning states may demonstrate collective commitment to shared legal and political principles, thereby reinforcing the normative foundations of international governance.

At the same time, the governance approach draws attention to the institutional challenges associated with complex sanctions systems. These include issues such as regulatory fragmentation across jurisdictions, uneven enforcement capacities, and the potential for excessive compliance burdens on economic actors. Such challenges highlight the importance of institutional design and regulatory coherence in determining whether sanctions regimes can remain effective and sustainable over extended periods.

Overall, the governance perspective provides an important conceptual framework for analysing contemporary sanctions regimes. By emphasising institutional structures, regulatory mechanisms, and the interaction between public and private actors, this approach makes it

possible to understand sanctions as integrated systems of governance rather than merely as episodic instruments of economic pressure. This analytical perspective is particularly relevant for examining the EU sanctions regime against Russia, which has developed into one of the most extensive and institutionally complex sanctions architectures in modern international politics.

An important strand of contemporary sanctions scholarship focuses on the legal dimension of sanctions regimes, examining restrictive measures as regulatory instruments embedded within national and supranational legal systems. In the case of the European Union, sanctions operate through a sophisticated legal framework consisting of Council decisions adopted under the Common Foreign and Security Policy and implementing regulations that are directly applicable within the EU legal order. This legal architecture transforms sanctions from purely political instruments into binding regulatory regimes that impose obligations on economic actors and public authorities across the Member States (*Council of the European Union, 2014a*; *Council of the European Union, 2014b*).

Within this context, a growing body of literature emphasises the importance of legal design and legal certainty for the operational effectiveness of sanctions regimes. Legal clarity is particularly important in regulatory environments where sanctions must be implemented by a wide range of actors, including financial institutions, corporations, and regulatory authorities. Ambiguous or overly broad legal provisions may create interpretative uncertainty, leading either to inconsistent enforcement or to excessive compliance behaviour that may disrupt legitimate economic activity. Consequently, the effectiveness of sanctions depends not only on the scope of restrictions but also on the precision and coherence of the legal framework through which those restrictions are implemented (*Council of the European Union, 2018*).

Another important aspect of the legal dimension of sanctions concerns the role of judicial review and legal accountability. Within the EU legal system, restrictive measures may be challenged before the Court of Justice of the European Union, particularly in cases involving asset freezes or listings of individuals and entities. Judicial scrutiny therefore imposes important constraints on the design of sanctions, requiring that measures respect principles such as proportionality, legal certainty, and the protection of fundamental rights. As Lonardo (*2023*) observes, the interaction between sanctions policy and judicial oversight creates a complex legal environment in which regulatory effectiveness must be balanced with procedural guarantees and legal safeguards.

Recent scholarship has also begun to explore the notion of legal resilience as a characteristic of durable sanctions regimes. In this context, legal resilience refers to the capacity of a sanctions framework to maintain its operational effectiveness despite evolving political conditions, legal challenges, and attempts at regulatory circumvention. A legally resilient sanctions regime typically demonstrates several key attributes, including clear drafting of regulatory provisions, consistent interpretative guidance, effective mechanisms for updating legal instruments, and the ability to integrate new regulatory measures without undermining the coherence of the existing legal framework.

In the case of the European Union, legal resilience is closely linked to the institutional capacity of EU institutions to adapt sanctions legislation through successive amendments and interpretative instruments. Since the introduction of sanctions against Russia in 2014 and their subsequent expansion after 2022, the EU has repeatedly updated its regulatory framework to address new forms of economic activity, technological developments, and circumvention strategies. This iterative process illustrates how sanctions regimes evolve through continuous legal refinement rather than through a single legislative act.

At the same time, the increasing complexity of sanctions legislation raises challenges related to regulatory manageability and enforcement consistency. As sanctions frameworks expand, maintaining coherence among numerous legal provisions and ensuring uniform implementation across Member States becomes more difficult. These challenges highlight the importance of institutional coordination and administrative guidance in sustaining the legal functionality of sanctions regimes over time.

Overall, the legal dimension of sanctions governance demonstrates that sanctions effectiveness cannot be understood solely through economic or political analysis. Instead, the durability and operational strength of sanctions regimes depend significantly on the quality of their legal architecture. By examining the concept of legal resilience, the study seeks to contribute to the growing body of scholarship that recognises the central role of law in shaping the structure, sustainability, and effectiveness of contemporary sanctions systems.

In recent years, the study of sanctions regimes has increasingly incorporated the concept of hybrid sanctions, reflecting the growing complexity of contemporary restrictive measures. Traditional sanctions analysis typically distinguishes between political, economic, and legal instruments; however, modern sanctions regimes often operate through mechanisms that combine elements of multiple regulatory domains. As a result, a number of scholars and policy analysts have begun to emphasise the importance of cross-domain interactions in understanding how sanctions generate cumulative pressure on targeted actors.

Hybrid sanctions can be understood as regulatory mechanisms in which legal restrictions interact with financial controls, logistical constraints, technological limitations, and administrative enforcement procedures to produce integrated policy effects. In such cases, the effectiveness of sanctions does not arise solely from individual legal prohibitions but from the combined impact of several interrelated regulatory layers. This integrated character is particularly visible in contemporary sanctions regimes that target complex economic infrastructures, such as financial networks, energy markets, and global supply chains.

In the context of the European Union's sanctions against Russia, hybrid regulatory mechanisms have become increasingly prominent following the large-scale expansion of restrictive measures after 2022. These measures include financial asset freezes, technological export restrictions, transport and insurance limitations, and sector-specific regulatory interventions designed to disrupt strategic economic sectors. Importantly, many of these measures operate simultaneously through legal regulation, market incentives, and compliance monitoring, creating a multi-layered system of constraints that extends beyond the formal boundaries of traditional sanctions categories (*European Commission, 2025*).

Another important feature of hybrid sanctions is their relationship to anti-circumvention policy. As sanctions regimes expand, targeted actors frequently attempt to mitigate their impact by establishing alternative financial channels, rerouting trade flows, or using intermediary jurisdictions. In response, sanctioning authorities often introduce additional regulatory mechanisms designed to detect and prevent such circumvention strategies. These mechanisms may involve enhanced due diligence requirements, reporting obligations, and cooperation between regulatory authorities and private-sector actors.

Hybrid sanctions therefore operate not only through direct prohibitions but also through the disruption of enabling infrastructures that facilitate economic activity. For example, restrictions on financial services, maritime insurance, logistics support, and technological assistance can significantly limit the ability of sanctioned entities to maintain access to international markets even when direct trade prohibitions are limited. In this way, hybrid

sanctions function by increasing the operational difficulty and economic cost of circumvention strategies.

The hybrid character of contemporary sanctions regimes also reflects the growing role of private-sector participation in enforcement processes. Financial institutions, insurance companies, logistics providers, and multinational corporations often implement sanctions by integrating regulatory requirements into internal compliance systems, risk assessments, and transaction monitoring procedures. Through these mechanisms, private actors become key participants in the operational implementation of sanctions policy.

At the same time, the development of hybrid sanctions introduces new analytical and regulatory challenges. Because hybrid measures operate across multiple regulatory domains, they may produce complex interactions between legal norms, market behaviour, and administrative enforcement practices. These interactions can create difficulties in attributing specific outcomes to individual sanctions measures and may complicate the evaluation of sanctions effectiveness.

Nevertheless, the concept of hybrid sanctions provides an important analytical framework for understanding the evolving nature of contemporary sanctions regimes. By recognising the cross-domain interactions that characterise modern restrictive measures, scholars and policymakers can better analyse how sanctions operate within complex economic and regulatory environments. This perspective is particularly relevant for the EU sanctions regime against Russia, where the combination of legal restrictions, financial controls, technological limitations, and compliance-based enforcement has produced one of the most comprehensive sanctions architectures in modern international governance.

A further significant direction in contemporary sanctions research concerns the role of compliance systems in the practical implementation of sanctions regimes. While traditional scholarship often focused primarily on the legal adoption of restrictive measures, more recent studies emphasise that the real-world effectiveness of sanctions depends heavily on the capacity of regulatory and private-sector actors to translate legal prohibitions into operational constraints within financial and commercial transactions.

Compliance systems represent the institutional interface between regulatory authorities and market actors, through which sanctions policy is implemented in practice. These systems typically involve a combination of internal control procedures, due diligence requirements, transaction monitoring, risk assessments, and reporting obligations designed to ensure that economic activities remain consistent with applicable sanctions regulations. Financial institutions, multinational corporations, insurers, exporters, and logistics operators play a particularly important role in this process, as they frequently serve as intermediaries responsible for identifying and preventing transactions that may violate sanctions rules.

In the context of the European Union, the importance of compliance infrastructures has increased significantly as the sanctions regime against Russia has expanded in scope and complexity. EU institutions and regulatory bodies have introduced a range of guidance documents and supervisory recommendations aimed at strengthening the internal compliance mechanisms of financial institutions and economic operators. These measures are intended to ensure that restrictive measures are consistently applied across different sectors and jurisdictions and that potential violations can be detected at an early stage (*Council of the European Union, 2018*; *European Banking Authority, 2024*).

Compliance-based enforcement has several important implications for the functioning of sanctions regimes. First, it allows sanctions policy to operate through distributed enforcement networks, rather than relying solely on direct state supervision. By embedding sanctions obligations within the internal governance systems of private organisations, regulatory

authorities effectively extend the reach of sanctions enforcement into the operational structures of global economic activity.

Secondly, compliance systems contribute to the preventive dimension of sanctions enforcement. Through mechanisms such as customer due diligence, beneficial ownership verification, and transaction screening, financial institutions and corporations can identify potential sanctions risks before transactions are executed. This preventive approach helps to reduce the likelihood of sanctions violations and enhances the overall effectiveness of the regulatory framework.

At the same time, the increasing reliance on compliance infrastructures introduces new challenges for sanctions governance. One frequently discussed issue is the phenomenon of over-compliance, in which economic actors adopt excessively cautious interpretations of sanctions regulations in order to avoid potential legal or reputational risks. While such behaviour may reduce the likelihood of sanctions violations, it can also generate unintended consequences, including disruptions to legitimate economic activity and increased regulatory burdens for businesses (*van Essen, 2025*).

Another challenge concerns the fragmentation of compliance practices across jurisdictions and sectors. Because sanctions implementation depends on a wide range of private and public actors, variations in institutional capacity, regulatory interpretation, and enforcement priorities may lead to uneven application of sanctions rules. Such inconsistencies can weaken the coherence of the sanctions regime and create opportunities for circumvention.

Despite these challenges, the growing emphasis on compliance systems reflects an important transformation in the governance of sanctions. Contemporary sanctions regimes increasingly rely on regulatory ecosystems in which legal norms, administrative guidance, and private-sector compliance practices operate together to produce effective restrictions on targeted economic activities. In this sense, compliance infrastructures serve as a crucial mechanism through which formal legal provisions are translated into practical limitations within global economic networks.

The study therefore treats compliance capacity not as a secondary or purely technical element of sanctions implementation, but as a key determinant of the operational effectiveness of the EU sanctions regime. Understanding the structure and functioning of compliance systems is essential for analysing how sanctions regimes achieve their intended effects within complex and highly interconnected international economic environments.

The review of the scholarly literature demonstrates that sanctions studies have developed along several important but only partially interconnected directions. Classical scholarship established the basic analytical foundations for understanding sanctions as instruments of coercion, deterrence, and economic statecraft, with particular attention to questions of macroeconomic pressure, policy change, and coalition behaviour (*Drezner, 1999*; *Hufbauer et al., 2009*; *Pape, 1997*). This body of work remains essential for conceptualising the strategic logic of sanctions, yet it is often limited by its tendency to assess effectiveness primarily in terms of immediate behavioural change or aggregate economic cost.

Subsequent research has broadened this perspective by analysing sanctions as institutionalised forms of governance rather than merely as episodic foreign-policy interventions. This governance-oriented literature has drawn attention to the importance of legal frameworks, administrative coordination, regulatory infrastructures, and the role of private actors in implementing sanctions policy (*Council of the European Union, 2018*; *Council of the European Union, 2022*; *Portela, 2010*). Such studies have made a significant contribution by showing that sanctions

increasingly operate through complex and enduring institutional arrangements, especially in the case of the European Union.

A further strand of literature has highlighted the growing relevance of the legal dimension of sanctions regimes, including questions of legal certainty, proportionality, judicial review, and interpretative coherence. Within this field, the concept of legal resilience has begun to emerge implicitly as a useful analytical category for understanding how sanctions frameworks preserve operational viability under conditions of contestation, adaptation, and legal scrutiny (*Lonardo, 2023*). However, this concept remains insufficiently systematised in the existing literature and has rarely been integrated into broader models of sanctions effectiveness.

At the same time, more recent scholarship and policy analysis have increasingly acknowledged the importance of hybrid sanctions and compliance-based enforcement. These approaches reveal that modern sanctions frequently operate through cross-domain regulatory mechanisms involving legal restrictions, financial controls, logistical constraints, technological barriers, anti-circumvention measures, and distributed private-sector enforcement (*European Banking Authority, 2024*; *European Commission, 2025*). Nevertheless, the literature in these areas often remains fragmented: legal analyses tend to focus on doctrinal or institutional aspects, while compliance-related studies are frequently more technical and operational in orientation.

At the same time, an important intermediate position between academic scholarship and institutional policy analysis is occupied by the analytical volume *The EU Sanctions Architecture against Russia: Effectiveness, Limits, and Strategic Options for 2026–2030* (*Buychik et al., 2026*). Unlike narrowly specialised legal, economic, or compliance-oriented studies, this publication offers a synthetic multidimensional interpretation of the sanctions regime by examining it across six interconnected dimensions—political, economic, social, legal, hybrid, and compliance—and by explicitly treating effectiveness as a cumulative, differentiated, and time-sensitive category rather than a binary outcome. Its analytical value lies in demonstrating the need to assess sanctions through the interaction of legal architecture, adaptive circumvention, implementation capacity, and medium-term governance quality. At the same time, precisely because this publication is a policy-analytical report (*Buychik et al., 2026*) rather than a conventional academic article, it also underscores the need for a more conceptually integrated scholarly framework of the kind developed in the study.

As a result, the literature review reveals a clear research gap. Although contemporary scholarship offers valuable insights into individual dimensions of sanctions governance, it still lacks a sufficiently integrated analytical framework capable of explaining how legal resilience, hybrid regulatory instruments, and compliance capacity interact to shape the long-term effectiveness of a sanctions regime. This gap is particularly significant in relation to the European Union's sanctions against the Russian Federation, which represent one of the most extensive and institutionally complex sanctions architectures in contemporary international practice.

Accordingly, the study seeks to address this gap by developing a multidimensional analytical model in which the EU sanctions regime is conceptualised as an integrated governance architecture. Within this framework, sanctions effectiveness is understood not as a binary question of success or failure, but as the outcome of the interaction between normative design, institutional adaptability, hybrid regulatory reach, and operational implementation. In this way, the article aims to advance sanctions scholarship beyond segmented approaches and towards a more comprehensive understanding of how modern restrictive regimes function over extended periods of geopolitical confrontation.

Results

The EU Sanctions Regime as an Integrated Governance

The analysis conducted in the study indicates that the EU sanctions regime against the Russian Federation can no longer be adequately described as a mere succession of politically motivated sanctions packages. Rather, it has developed into a structured and durable governance architecture composed of restrictive measures, legal controls, administrative routines, interpretative guidance, and implementation practices that operate across several interlinked policy domains. This conclusion is consistent with the internal logic of the analytical report (*Buychik et al., 2026*), which explicitly treats sanctions not as isolated decisions but as a coherent regime whose practical force derives from the interaction of instruments, institutions, markets, and adaptive behaviour.

Such a reconceptualisation is analytically significant because it shifts attention away from the purely chronological accumulation of packages and towards the institutional properties of the regime itself. In the case of the European Union, restrictive measures are embedded within a normative and administrative order shaped by Council regulations and decisions, interpretative communications, national enforcement frameworks, and increasingly sophisticated compliance infrastructures (*Council of the European Union, 2014a*; *Council of the European Union, 2014b*; *Council of the European Union, 2018*; *Council of the European Union, 2022*). Consequently, the analytical object is not the individual package as such, but the structured environment within which successive packages are adopted, implemented, refined, and made operational.

This finding also confirms that the regime has undergone an important transformation since 2022. Initially, many measures were perceived primarily through the prism of rapid political signalling and immediate restrictive effect. However, subsequent development demonstrates that later packages increasingly performed functions of densification, calibration, anti-circumvention reinforcement, and legal-operational refinement. In other words, the architecture matured not simply by becoming broader, but by becoming more institutionally differentiated and operationally self-conscious. The report's General Introduction (*Buychik et al., 2026*) and first methodological chapter both emphasise this dynamic of expansion, refinement, adaptation, and institutional learning, thereby supporting the conclusion that the regime must be analysed as a managed field of governance rather than as a reactive chain of sanctions episodes.

From this perspective, governance is not used here as a rhetorical metaphor but as an analytical category. The regime displays the characteristic features of governance architecture: it has an identifiable legal core, established administrative routines, implementation expectations for both public and private actors, mechanisms of interpretative maintenance, and a forward-looking logic of periodic recalibration. Moreover, it increasingly depends on internal quality variables such as drafting precision, enforcement coherence, and the capacity to adapt to circumvention practices. These features distinguish a mature sanctions regime from a loose aggregate of political restrictions and justify examining it through the conceptual lens of integrated governance (*Council of the European Union, 2018*; *Portela, 2010*).

The results of the analysis further demonstrate that the governance architecture of the EU sanctions regime is internally differentiated into six interconnected dimensions: political, economic, social, legal, hybrid, and compliance. This six-dimensional model is not merely a classificatory convenience; rather, it reflects the actual operational logic of the regime. The report explicitly structures its analytical assessment around these dimensions and treats them as mutually connected components of a single policy architecture rather than as autonomous thematic blocks.

The political dimension concerns signalling, delegitimation, diplomatic restriction, and the management of coalition coherence. Its main function is to codify the Union's normative position, narrow the sanctioned state's room for international manoeuvre, and maintain strategic alignment among partner jurisdictions. The economic dimension is oriented towards structural pressure through trade restrictions, financial constraints, technological deprivation, transport limitations, and sectoral disruption. The social dimension concerns mediated effects on welfare, mobility, household conditions, labour patterns, and the differentiated social costs of long-term external restriction. The legal dimension addresses the normative architecture of restrictive measures, including prohibitions, derogations, judicial review, legal certainty, and the long-term defensibility of the sanctions framework. The hybrid dimension captures cross-domain instruments and enabling structures that cannot be adequately explained within conventional legal or economic categories alone. Finally, the compliance dimension concerns implementation capacity, operator behaviour, due-diligence systems, anti-circumvention vulnerabilities, and enforcement-related governance challenges.

What is analytically important is that these dimensions are not parallel layers operating independently of one another. On the contrary, the report repeatedly shows that their interaction is constitutive of the regime's real force. Political signalling may reinforce compliance caution; legal precision may increase the effectiveness of economic restrictions; hybrid instruments may depend on compliance systems as their operational transmission pathway; and social effects may be shaped by changes in economic reproduction, budgetary allocation, and administrative adaptation within the target state. Accordingly, the regime is best understood as a differentiated yet interdependent system in which the effectiveness of one dimension is frequently conditioned by the institutional quality of the others.

This finding is especially significant for the analytical design of the present article. It confirms that sanctions effectiveness cannot be assessed in a unidimensional manner. A regime may perform strongly in terms of political signalling and coalition coordination while remaining uneven in legal manageability or compliance coherence. Conversely, a narrower legal measure may generate substantial practical effect if it is clearly drafted, well communicated, and embedded in a strong compliance environment. The six-dimensional architecture therefore provides not only a descriptive map of the regime but also an explanatory framework for understanding why sanctions effectiveness is necessarily differentiated, cumulative, and mediated by institutional quality rather than reducible to one headline indicator.

A central result of the present analysis is that the practical force of the EU sanctions regime is cumulative rather than additive in a simple mechanical sense. The report expressly argues that restrictive measures which appear modest when viewed in isolation may become materially significant once combined with parallel controls, guidance, reputational effects, transaction-cost escalation, and market adaptation. This means that the sanctions regime does not operate primarily through the linear aggregation of legal prohibitions, but through interaction effects among instruments, institutions, and behavioural responses.

This cumulative logic is visible in at least three respects. First, successive packages generally do not replace earlier measures; rather, they densify, refine, and operationally reinforce the existing architecture. The cumulative legal structure of the regime therefore matters as much as the formal content of any individual restriction. Secondly, pressure is generated not only by direct prohibition but also by the interaction between law and anticipatory operator behaviour. A formally limited restriction may trigger broader market caution, tighter risk controls, altered routing decisions, and reduced willingness of intermediaries to engage in borderline conduct. Thirdly, cumulative effects unfold across different time horizons. Immediate shock effects may

be modest, yet medium-term restructuring and longer-term erosion of capabilities may still be significant, especially where access to complex technologies, specialised services, and legally usable economic resources becomes progressively constrained.

The results therefore support a multidimensional interpretation of effectiveness. The report explicitly rejects the binary question of whether sanctions "work" in the abstract and instead distinguishes between coercive, degradational, deterrent, coordinative, and legitimising effects. This distinction is methodologically important because cumulative pressure often manifests differently across these registers. A measure may not produce immediate policy reversal, yet it may still contribute to capability degradation, coalition discipline, anti-circumvention pressure, or the reinforcement of normative boundaries. In this respect, cumulative effectiveness is not synonymous with a singular coercive breakthrough. Rather, it is the layered production of pressure through several mutually reinforcing channels.

The findings also suggest that cumulative pressure depends heavily on quality of implementation. A measure that is legally robust but poorly monitored may underperform. Equally, a formally narrower measure may outperform broader restrictions if it is accompanied by clear guidance, effective due diligence, coordinated enforcement, and high levels of private-sector uptake. This confirms that cumulative interaction effects cannot be understood solely through the content of sanctions law. They must also be analysed through governance variables such as legal-operational precision, compliance capacity, and institutional coordination. In this sense, cumulative pressure is the practical expression of sanctions as governance architecture rather than as isolated policy output.

The analysis additionally demonstrates that the governance architecture of the EU sanctions regime is not confined to the formal boundaries of the EU legal order. In operational terms, the regime is both European and transnational. Its practical force depends to a substantial degree on coordination with aligned partners, especially in areas such as finance, trade controls, transport, insurance, energy-related services, export controls, and anti-circumvention practice. The report explicitly stresses that a narrow reading of EU acts alone may obscure the broader environment in which counterparties assess risk, intermediaries test regulatory boundaries, and transactions are rerouted through external channels.

This external dimension has several consequences for the study. First, it means that the effectiveness of EU sanctions cannot be evaluated solely on the basis of internal legal stringency. Even a formally strong EU measure may lose force where coordination gaps create exploitable asymmetries, enforcement standards diverge, or third-country channels remain readily available. Secondly, external alignment may transform a narrower measure into a more consequential constraint when parallel restrictions and shared enforcement expectations increase the practical costs of circumvention. Thirdly, transnational coordination affects not only direct restriction but also the wider risk environment within which private actors operate. Firms often assess sanctions exposure in light of a combined European, allied, and market-based risk field rather than through a single jurisdictional lens.

The report's reasoning therefore supports the conclusion that external coordination must be treated as a constitutive component of governance architecture rather than as an optional supplement. The regime's practical weight is shaped by information exchange, mutual reinforcement, synchronisation of restrictive measures, and the extent to which aligned partners close alternative channels in sensitive sectors. This finding also helps explain why sanctions governance increasingly involves not only autonomous EU regulation but also broader coalition management and evidence-led adaptation to intermediary jurisdictions, shadow infrastructures, and route substitution.

At the same time, the results reveal that transnationality introduces its vulnerabilities. Coordination gaps, uneven external enforcement, and divergences in administrative practice can reduce the coherence of the regime and generate operational weak points. For this reason, external alignment should not be treated as a static condition but as a variable of effectiveness that requires continuous maintenance. This reinforces the broader conclusion that the EU sanctions regime is best analysed as a governance architecture whose strategic value depends not only on internal legal design but also on the quality of its integration into wider coalition-based pressure systems.

The findings of this section support five interim conclusions that structure the analysis that follows. First, the EU sanctions regime against the Russian Federation must be understood as a durable and institutionally differentiated governance architecture rather than as a simple sequence of sanctions packages. Secondly, this architecture is composed of six interconnected dimensions—political, economic, social, legal, hybrid, and compliance—the interaction of which is essential to the regime's real operational force. Thirdly, the practical effect of sanctions is cumulative and interaction-based: measures derive significance from how they combine with one another, with interpretative guidance, with market behaviour, and with adaptation dynamics. Fourthly, external coordination with aligned partners is not a secondary context but a constitutive part of the regime's transnational operational reality. Fifthly, the effectiveness of the architecture depends not only on the breadth of restrictions but also on the quality of legal drafting, implementation capacity, compliance translation, and coalition coherence.

These findings provide the conceptual bridge to the next. If the regime is indeed a governance architecture rather than a loose aggregate of restrictions, then its durability cannot be explained solely by political will or economic scope. It must also be explained through the quality of its internal legal construction. For that reason, the next part of the Results turns to legal resilience as a specific condition of long-term sanctions effectiveness.

Legal Resilience as a Condition of Long-Term Sanctions Effectiveness

The results of the study indicate that the long-term effectiveness of the EU sanctions regime depends not only on the breadth of prohibitions or the political willingness to sustain pressure, but also on a more specific institutional quality that may be described as legal resilience. In the context of the present article, legal resilience denotes the capacity of the sanctions framework to remain intelligible, enforceable, reviewable, and adaptable over time under conditions of prolonged geopolitical confrontation, evolving circumvention practices, and sustained judicial scrutiny. This understanding is strongly supported by the analytical report, which treats legal sanctions not as a loose collection of restrictive acts but as a normative and institutional regime composed of constitutional, regulatory, administrative, interpretative, enforcement, and judicial layers.

This concept extends beyond the narrow question of formal legality. A sanctions regime may be legally valid in a minimal sense and yet still be operationally fragile if its provisions are too vague, its derogation structures too inconsistent, its enforcement expectations too fragmented, or its review mechanisms too weak to sustain legitimacy under pressure. For that reason, legal resilience should be understood as a multi-component property of the sanctions architecture, combining clarity of drafting, coherence of legal structure, procedural manageability, capacity for amendment, and judicial defensibility. In this respect, the findings of the report reinforce the argument that the legal sphere is not simply the site where sanctions are written down. It is where geopolitical intent is translated into durable and reviewable operational norms.

The analytical significance of this finding is considerable. It suggests that long-term sanctions effectiveness is not reducible to economic severity. A regime that is overextended in form yet poorly constructed in law may generate uncertainty, litigation exposure, uneven implementation, and declining operator confidence. By contrast, a more precisely calibrated regime may exert stronger long-term pressure because it is easier to apply, defend, update, and internalise across public and private sectors. The results therefore confirm that legal resilience should be treated not as a secondary doctrinal concern, but as one of the central determinants of sanctions durability.

A major finding of the report is that clarity and precision of drafting are among the principal conditions of legal resilience. The report repeatedly stresses that sanctions law need not eliminate every possible grey area in order to remain valid, but it must remain sufficiently intelligible to guide conduct, support enforcement, and withstand judicial scrutiny. This position is consistent both with the report's analysis of Rosneft and with the broader logic of EU sanctions governance, in which complex restrictions are implemented by courts, regulators, firms, banks, insurers, and other operators that require a workable degree of legal certainty in order to act consistently.

The present results show that drafting discipline matters on at least three levels. First, it affects operator intelligibility: restrictive measures are more likely to be followed correctly where the legal text itself communicates the scope of prohibition, the logic of exceptions, and the relationship between rule, derogation, and reporting duty in a sufficiently transparent manner. Secondly, it affects administrative and judicial defensibility: a better-structured norm is easier to justify, interpret, and enforce across Member States. Thirdly, it affects anti-circumvention adaptability: disciplined drafting makes it easier to close loopholes through subsequent amendments without destabilising the broader architecture of the regime. The report's discussion of normative precision and drafting discipline supports precisely this conclusion and treats clearer article structure, better versioning discipline, and codification of recurrent clarifications as essential for the medium-term durability of the system.

This finding has broader analytical implications. In a mature sanctions regime, ambiguity does not merely produce inconvenience; it may create material differences in application, invite defensive over-compliance, or leave exploitable spaces for circumvention. At the same time, excessive rigidity may reduce the system's ability to respond to new patterns of evasion. Therefore, the report's results support a balanced conclusion: legal resilience requires not maximal textual density, but a disciplined equilibrium between precision and functional adaptability. That conclusion also helps explain why the EU's growing use of guidance documents and consolidated FAQs has become so important. Soft-law clarification can support implementation, but long-term resilience requires that the most recurrent and legally significant clarifications gradually migrate into the operative legal framework itself rather than remaining indefinitely external to it.

The analysis further demonstrates that derogations and exemptions are not signs of doctrinal weakness in the sanctions regime; on the contrary, they are often integral to its legal resilience. A mature sanctions architecture cannot be assessed solely by the breadth of its prohibitions. It must also be assessed by the quality of the legal limits that discipline those prohibitions and by the existence of protected pathways that preserve proportionality, legal certainty, and constitutional acceptability. The report consistently emphasises this point, arguing that a sustainable sanctions regime is one that exerts pressure without collapsing into normatively overbroad or administratively unmanageable restriction.

From the results of the legal analysis, three functions of derogations become especially clear. First, they perform a proportionality function by preserving protected areas of legitimate activity, including rights-sensitive fields and implementation situations involving third-party interests. Secondly, they perform an operability function by reducing avoidable friction, thereby limiting the risk that economic operators retreat from lawful conduct simply because the legal perimeter of permission is too uncertain. Thirdly, they perform a legitimising function by showing that the regime remains embedded within a rule-of-law order rather than operating as an unchecked field of executive discretion. This reading is reinforced by the report's proposal for more structured drafting of authorisation and derogation procedures and its argument that clearer procedural parameters would reduce national divergence while improving predictability without weakening the regime.

The findings also show that the quality of derogation design matters as much as the existence of derogations themselves. Where exceptions are drafted inconsistently, buried in scattered provisions, or dependent on opaque procedural expectations, they may fail to provide the stabilising effect they are meant to achieve. In such circumstances, operators may react with defensive caution, while national authorities may diverge in their treatment of similar cases. Accordingly, the report's emphasis on protected legal pathways and controlled derogations should be understood as an argument for governance quality rather than legal softness. In long-term sanctions governance, derogations are part of resilience because they help preserve the distinction between strategic pressure and normatively overbroad interference.

A further major result concerns the role of judicial defensibility in sustaining the long-term effectiveness of the sanctions regime. The report makes clear that a durable sanctions architecture must survive not only political contestation and operational circumvention, but also sustained litigation pressure. Judicial review does not appear in this framework as an external obstacle to sanctions policy; rather, it functions as one of the mechanisms through which the regime is stabilised, disciplined, and rendered more durable. The report explicitly argues that rule-of-law constraints do not weaken the regime, but help to preserve it by making it more defensible over time.

The case-law discussion in the report supports several important conclusions. The reasoning associated with Rosneft confirms that sanctions law may employ general legal categories without automatically violating legal certainty, provided that the relevant provisions remain sufficiently clear in the large majority of cases and can be interpreted with judicial assistance where necessary. This is doctrinally significant because it rejects the false alternative between maximal precision and legal invalidity. At the same time, the report's treatment of more recent litigation, including cases concerning listings, reporting obligations, legal advisory restrictions, and third-party effects, shows that the courts are willing to uphold intrusive measures where the Council demonstrates a sufficiently clear legal basis, a legitimate general-interest aim, and proportional structuring of interference.

This judicial dimension is central to legal resilience for two reasons. First, it creates review-conditioned discipline in legislative and administrative drafting: measures that may later be tested in court are more likely to be formulated with attention to evidence, proportionality, and definitional clarity. Secondly, it sustains regime legitimacy by ensuring that sanctions remain reviewable under EU law rather than operating as opaque executive instruments. The results therefore support a nuanced conclusion: litigation pressure is not simply a source of vulnerability; it is also a mechanism of institutional refinement. A regime that survives repeated judicial testing is more likely to remain governable, credible, and sustainable over the medium term than one that relies on unreviewed administrative breadth.

The present analysis also demonstrates that legal resilience depends not only on legislative quality and judicial review, but on the degree of enforcement convergence achieved across the regime. Because EU sanctions are implemented through a multi-level architecture involving EU institutions, national competent authorities, courts, and private actors, uneven enforcement can undermine the coherence of otherwise well-drafted measures. The report explicitly identifies enforcement convergence, over-compliance, and private-law frictions as a core cluster of issues for long-term legal resilience, indicating that the legal architecture of sanctions cannot be assessed in abstraction from the practical conditions of its application.

This finding is especially important because a mature sanctions regime increasingly intersects with private law, contractual risk allocation, compliance governance, and rights-sensitive areas of economic activity. Where legal expectations differ substantially across Member States, or where guidance remains uneven, firms may react by adopting highly defensive positions that go beyond the formal requirements of the law. Such over-compliance may reduce circumvention risk in some cases, but it can also create disproportionate burdens, disrupt lawful transactions, and produce the very fragmentation that weakens the regime's legal-operational coherence. The report repeatedly warns that excessive burden, divergent national practice, and interpretative complexity may undermine effectiveness even where the formal legal text appears stringent.

The results therefore suggest that legal resilience includes a practical requirement of predictable application across jurisdictions and sectors. In this respect, convergence is not merely an administrative ideal but a condition of long-term legal operability. The more central sanctions become to EU governance, the less sustainable it is for radically divergent enforcement cultures to persist across Member States. This is one reason why the report places such emphasis on guidance quality, procedural consistency, dialogue with the private sector, and the broader institutionalisation of sanctions within the Union's enforcement and security architecture.

A particularly important result of this section is that legal resilience must be understood as a dynamic, not static, property of the sanctions regime. The report repeatedly links long-term operability to update capacity: the ability of the legal framework to absorb new patterns of circumvention, refine existing rules, close loopholes, and maintain coherence across successive waves of amendment. In a regime expected to remain relevant through 2026–2030, update capacity is not optional. It is part of what makes sanctions law resilient rather than merely extant.

The significance of this finding lies in the cumulative nature of the EU sanctions regime. Because the architecture develops through amendments to foundational regulations and related soft-law clarification, its durability increasingly depends on whether change can be introduced without rendering the framework unintelligible. The report's discussion of amendment history, versioning discipline, and codification of recurrent FAQ clarifications illustrates this point well. A regime that expands continuously but without sufficiently disciplined integration may become formally richer yet practically harder to navigate. Conversely, a regime that updates itself through clearer article-by-article structuring, concordance mapping, and better integration of recurrent interpretative issues is more likely to preserve its operational intelligibility.

This confirms that resilience in sanctions law is not equivalent to immobility. On the contrary, a legally resilient regime is one that can change without losing coherence. Such a regime preserves both continuity and adaptability: continuity in its legal foundations and institutional logic, and adaptability in its capacity to respond to new risks, intermediary practices, and hybrid circumvention environments. For the purposes of the study, this is especially important because it reinforces the article's core argument that the future effectiveness of the EU sanctions regime

will depend less on simple expansion than on the quality of maintenance, refinement, and legally disciplined recalibration.

The results support several interim conclusions. First, legal resilience emerges as a distinct explanatory variable of sanctions effectiveness rather than a merely ancillary legal concern. Secondly, such resilience is composed of several mutually reinforcing elements: clarity and precision of drafting, coherent derogation design, judicial defensibility, enforcement convergence, and update capacity. Thirdly, derogations and protected pathways should be interpreted not as dilution, but as instruments of proportionality and long-term operability when they are disciplined and clearly structured. Fourthly, litigation pressure does not simply expose the regime to risk; it also stabilises it by compelling better evidence, clearer reasoning, and stronger normative discipline. Fifthly, resilience is dynamic: a sanctions framework that cannot adapt coherently to new forms of circumvention is unlikely to remain effective over an extended strategic horizon.

Thus, these findings also prepare the transition to the next. If legal resilience explains how the sanctions regime remains normatively durable and operationally defensible, the next question is how restrictive measures extend beyond conventional legal and economic categories and begin to function through cross-domain interactions. The analysis therefore now turns to hybridisation as the next major condition shaping the long-term effectiveness of the EU sanctions regime.

Hybridisation of Sanctions: Cross-Domain Instruments and Enabling Infrastructures

The results of the study indicate that the category of hybrid sanctions is analytically necessary because the contemporary EU sanctions regime against the Russian Federation increasingly operates through mechanisms that cannot be adequately captured within the traditional distinctions between political, economic, legal, and compliance measures. The report (*Buychik et al., 2026*) explicitly justifies the inclusion of a separate hybrid dimension on the ground that sanctions now interact with transport networks, logistics hubs, intermediary jurisdictions, shell and proxy structures, service fragmentation, information asymmetries, and adaptive commercial practices that cut across conventional policy categories. In this environment, a purely sectoral or purely doctrinal classification risks missing the actual mechanism through which pressure is generated.

This finding is particularly important for the internal logic of the article. The research demonstrated that legal resilience explains how the sanctions architecture remains normatively durable, reviewable, and governable over time. Yet legal resilience alone does not explain how pressure is exerted in domains where the decisive issue is not the legal validity of a single prohibition, but the capacity of the regime to disrupt enabling systems that make circumvention, substitution, and re-routing operationally viable. It is precisely here that the hybrid category becomes indispensable.

The results also confirm that the hybrid dimension is not a stylistic expansion of existing sanctions theory but a response to genuine empirical and operational complexity. The report's architecture makes clear that, by 2026, hybrid pressure and hybrid circumvention are no longer exceptional phenomena. They form part of the ordinary reality of sanctions governance, especially in relation to maritime routing, intermediary jurisdictions, technology-service ecosystems, and proxy facilitation networks. Accordingly, the hybrid category is required not because sanctions have merely become more complicated, but because the dominant operative mechanism of certain measures now depends on interactions across law, markets, services, logistics, and distributed risk management.

In analytical terms, this means that the mature EU sanctions regime must be understood not only as a set of direct prohibitions but also as a system of intervention against adaptive infrastructures. Where a measure derives much of its coercive force from the combined effect of legal norms, service withdrawal, routing disruption, information-sharing, and private risk governance, the hybrid category is not optional; it is conceptually required.

A key result of the analysis is that a genuinely hybrid measure cannot be identified simply by pointing to mixed or wide-ranging effects. Many sanctions generate consequences across multiple domains; however, such spillovers do not automatically make them hybrid. The report provides a particularly important conceptual test in this regard: cross-domain interaction must be constitutive rather than merely consequential. In other words, a measure is hybrid where its primary mechanism of pressure requires several domains to interact in order to produce its operative effect. If those domains were removed, the measure would lose much of its coercive force.

This distinction is central to the present article because it prevents the hybrid category from collapsing into an undisciplined label for "complex sanctions" in general. A conventional export ban, for example, may affect law, market behaviour, logistics, and compliance burdens, but if its core coercive logic remains intelligible as a direct restriction on exchange, it belongs primarily to the economic sphere. Similarly, a listings regime may influence finance, reputation, and operator caution without ceasing to be primarily a legal and political instrument. By contrast, a genuinely hybrid measure is one whose effectiveness depends on law activating market withdrawal, service denial, route instability, network mapping, and private enforcement behaviour together.

The report also introduces a second important criterion: the dominant function of the measure, not its total causal footprint, should determine classification. This methodological point is highly valuable. If every sanction were classified according to all of its effects, the report's structure—and by extension the article's analytical architecture—would become incoherent. The correct question is therefore not whether a measure touches several domains, but whether its dominant mechanism is best explained through cross-domain enabling systems rather than through a single sectoral rule-set. This result strongly supports the present article's broader argument that hybridisation is a matter of mechanism, not breadth alone.

A third criterion emerging from the report concerns the unit of analysis. Hybrid sanctions are best understood not through a sector, a class of actors, or a discrete prohibition, but through a network-centred approach involving nodes, chains, facilitators, proxy entities, service-layer fragmentation, and overlapping infrastructures. This network logic distinguishes hybrid measures from traditional categories and confirms that their explanatory core lies in the management and disruption of adaptive systems rather than in the isolated wording of individual legal prohibitions.

The analysis further demonstrates that anti-circumvention policy functions as a bridge category between conventional sanctions tracks and the hybrid dimension. This is one of the most important findings of the report's hybrid section. Anti-circumvention is not automatically hybrid in every instance. In many cases, due diligence guidance, red-flag frameworks, and operator advice remain primarily part of the compliance architecture. However, anti-circumvention becomes genuinely hybrid when the regulatory target is no longer a discrete violation, but a wider adaptive system composed of intermediary jurisdictions, fragmented services, layered ownership structures, route engineering, proxy entities, and facilitation networks.

This distinction is analytically significant because it clarifies the relationship between Section 4.3 and Section 4.4 of the report. The report states this relationship with particular precision:

compliance concerns the machinery that translates law into behaviour—screening protocols, beneficial-ownership checks, licensing practice, operator guidance, alert systems, governance standards, and institutional follow-through—whereas hybrid sanctions concern restrictive design directed at enabling systems such as routing corridors, service ecosystems, shadow infrastructures, and intermediary networks. Compliance is often the transmission mechanism of hybrid measures, but it is not identical to the hybrid instrument itself.

The results therefore support a two-level interpretation. At the first level, anti-circumvention functions as a compliance and enforcement task: identifying risks, improving due diligence, and reducing opportunities for evasion. At the second level, however, anti-circumvention becomes hybrid where policy is directed against the architecture of adaptation itself. This includes the management of third-country pathways, proxy channels, route anomalies, and service fragmentation. In such cases, the objective is not merely to detect breaches after the fact, but to constrain the operational ecology that makes circumvention scalable and repeatable.

This finding matters for the article's central argument because it shows how hybridisation expands sanctions governance beyond direct prohibition. The sanctions regime increasingly seeks not only to forbid certain transactions but to raise the systemic cost of adaptation, degrade the efficiency of re-routing, and narrow the availability of enabling infrastructures outside the Union. In that respect, anti-circumvention is a bridge category precisely because it connects formal regulatory design with the broader strategic management of adaptive networks.

One of the clearest empirical results of the hybrid analysis concerns logistics and maritime routing, especially the role of the shadow fleet as a hybrid pressure zone. The report treats this field not merely as a transport issue, but as a cross-domain environment in which legal restrictions, insurance access, ship management, ownership opacity, port action, route monitoring, and service denial interact to shape the practical effectiveness of sanctions. This makes the maritime domain a paradigmatic case of hybrid pressure, because the operative target is not a single transaction but a dispersed infrastructure of circumvention and logistical substitution.

The report's assessment of 2026–2030 is particularly instructive here. It notes that tightening the service perimeter and targeting the nodes that make shadow logistics scalable—owners, managers, insurers, and facilitators—is more strategically relevant than relying on static bans alone. This is an important result because it confirms the broader theoretical point advanced in this article: hybrid sanctions are most effective where they target the enabling layers of an adaptive system rather than its most visible outputs. Even where static prohibitions remain necessary, the decisive issue becomes whether the Union can progressively reduce the operational utility of the shadow fleet through vessel designations, service-layer denial, port access actions, and disruption of opaque ownership structures.

At the same time, the report recognises the limits of this field. If the shadow fleet becomes sufficiently large, routinised, and operationally autonomous, it may preserve substantial export volumes despite tighter restrictions on Western services. The report therefore identifies a potential "capacity floor" for circumvention, suggesting that the durability of sanctions effectiveness in this area depends on whether hybrid pressure can prevent the shadow fleet from becoming a stable substitute at scale. This finding is analytically important because it shows that hybrid effectiveness cannot be measured solely by the existence of pressure; it must also be assessed in relation to the target system's capacity to build alternative infrastructures.

Accordingly, logistics and maritime routing confirm the article's broader claim that hybrid sanctions are most visible where restrictive measures seek to disrupt circulation systems, service

chains, and infrastructural substitutability rather than simply prohibit a defined exchange. In this domain, pressure is exerted through tempo, closure, and cumulative interference across legal, financial, and logistical layers.

A further major result of the hybrid analysis concerns the role of technology-service ecosystems and broader facilitation infrastructures. The report demonstrates that certain restrictive measures derive their practical force not simply from export prohibitions as such, but from interventions directed at the service, knowledge, support, and contractual ecosystems that allow sensitive goods, technologies, and operational capabilities to circulate. This includes dual-use support restrictions, limits on technical assistance, service denial, advisory and certification constraints, and controls affecting the intermediary functions that sustain access to restricted capabilities.

This is analytically important because it reinforces the network-centred logic of the hybrid category. The coercive object here is not confined to a product or a direct trade flow. It is the distributed chain of facilitation that makes acquisition, use, maintenance, and substitution possible. In such cases, the effectiveness of the measure depends on whether service fragmentation, route instability, operator caution, and regulatory risk combine to degrade the viability of the wider support ecosystem. The report's hybrid architecture expressly recognises this and includes network-based listings and restrictions on facilitation infrastructures as one of the core hybrid instrument clusters.

The results also confirm that these ecosystems are particularly important because they are difficult to police through traditional categories alone. Sensitive support may be embedded in consultancy, documentation, certification, software, maintenance, brokerage, forwarding, legal structuring, or risk-bearing functions. A narrow reading of sanctions as direct prohibition may therefore understate the strategic significance of these service layers. Hybrid analysis, by contrast, makes it possible to see how control over facilitating infrastructures can raise the cost of adaptation even where direct substitution remains formally possible.

This finding directly supports the central thesis of the article. The long-term effectiveness of the EU sanctions regime depends not only on restricting what may be traded or financed, but on limiting the operational ecosystems that make technologically and commercially complex adaptation sustainable. The more that restrictive policy is able to identify and constrain these service-layer nodes, the more the regime moves from static restriction towards dynamic governance of enabling structures.

The report also makes clear that hybrid measures face distinctive structural constraints, the first of which is attribution. Because hybrid sanctions act against enabling systems rather than only against direct violators, the relevant actors are often indirect, modular, or partially deniable. A freight forwarder, intermediary financier, crypto platform, or service provider may handle activity that appears lawful in isolation while still functioning as part of a circumvention ecosystem. The report explicitly notes that, in hybrid sanctions, the most operationally relevant targets are often those for which functional importance is clearer than direct legal culpability. This makes hybrid targeting strategically realistic but also more vulnerable to legal and political challenge.

A second major constraint is evidentiary dispersion. The report explains that hybrid enforcement is especially dependent on fragmented red-flag constellations, route anomalies, business-partner profiles, ownership structures, contractual patterns, and shifts in third-country demand. Such evidence may be strategically persuasive while still remaining incomplete, intelligence-heavy, or difficult to convert into publicly usable proof. This matters greatly for legal-operational quality, because hybrid sanctions often depend on action taken under

conditions where the full structure of the network is strongly suspected on functional grounds before it is fully demonstrable in a conventional evidentiary format.

A third problem concerns boundary discipline. Because hybrid measures sit close to the borders of legal, economic, and compliance categories, there is a constant risk of conceptual inflation. The report addresses this by insisting on dominant function, network logic, and constitutive cross-domain interaction as criteria of classification. This is a major analytical strength. Without such discipline, the hybrid category could become too broad to remain useful. The results of the study therefore confirm that hybrid analysis must remain precise: it should identify measures whose operative force genuinely depends on interactions across several domains, not simply any measure with wide consequences.

Finally, the report highlights the issue of fragmented implementation and legitimacy risk. Since Member States remain central to sanctions enforcement, and since guidance itself is often non-binding or general in form, hybrid measures operate within a multi-layered enforcement field marked by varying administrative capacities, legal cultures, and institutional priorities. This can weaken consistency and complicate the governance of borderline cases. In addition, because hybrid measures often intervene against enabling systems rather than overtly unlawful actors, the line between strategic necessity and disproportionate interference may become more contested.

These risks do not negate the value of hybrid sanctions. Rather, they confirm that hybrid effectiveness is inseparable from governance quality, evidentiary discipline, and legal-operational calibration. In other words, hybrid pressure is powerful precisely because it reaches enabling systems—but that same reach makes it more demanding in terms of attribution, proof, and legitimacy.

The results support several interim conclusions. First, the hybrid category is analytically necessary because certain contemporary sanctions measures cannot be adequately explained within traditional legal, economic, or compliance classifications. Secondly, a genuinely hybrid measure is one in which cross-domain interaction is constitutive, not merely consequential, and in which the dominant mechanism of pressure depends on law, market behaviour, services, routing, and private risk governance operating together. Thirdly, anti-circumvention policy functions as a bridge category: it remains part of compliance where it concerns implementation machinery, but becomes hybrid where it targets adaptive enabling systems and circumvention ecologies. Fourthly, logistics, maritime routing, the shadow fleet, technology-service ecosystems, and network-based facilitation infrastructures represent the clearest empirical pressure zones of hybrid sanctions. Fifthly, hybrid measures possess distinct strengths—flexibility, adaptability, cross-domain reach, and the capacity to close loopholes without a complete redesign of the sanctions regime—but these strengths are inseparable from structural risks involving attribution, evidentiary dispersion, fragmented enforcement, and legitimacy contestation.

Thus, these findings establish the transition to the next. If hybrid measures help explain how sanctions governance reaches adaptive infrastructures and enabling systems, the next analytical question concerns the mechanism through which such measures—and the wider regime more generally—are translated into day-to-day behavioural constraints. The analysis therefore now turns to compliance as the operational transmission mechanism of the EU sanctions regime.

Compliance as the Operational Transmission Mechanism

The results of the study show that compliance must be treated not as an auxiliary or merely technical appendage to sanctions policy, but as one of its central operational mechanisms. The analytical report (*Buychik et al., 2026*) formulates this point with particular clarity: restrictive

measures shape behaviour not when they are merely promulgated, but when they are translated into screening protocols, licensing decisions, due-diligence procedures, beneficial-ownership checks, contractual controls, banking alerts, shipping restrictions, and internal risk judgements. In this sense, compliance is the principal channel through which law is converted into economic and institutional effect.

This finding has substantial analytical consequences for the present article. The previous demonstrated that hybrid instruments help explain how the sanctions regime reaches enabling systems and adaptive infrastructures. Yet those instruments do not become practically effective by virtue of legal design alone. They require an operational architecture capable of identifying relevant risks, processing them institutionally, and translating them into day-to-day restraint in financial, commercial, transport, insurance, advisory, and logistics practices. The regime therefore derives much of its practical force not from the abstract existence of prohibitions, but from the quality of behavioural transmission generated by compliance systems.

The results also suggest that traditional sanctions theory has often underestimated this point. Classical approaches have generally privileged macroeconomic pressure, coercive signalling, or legal permissibility, while devoting less attention to the implementation chain that determines whether restrictive measures are internalised by market actors in a sufficiently consistent and timely manner. By contrast, the report treats compliance as one of the decisive dimensions of the sanctions regime's maturity and resilience. This makes compliance a key explanatory variable of long-term effectiveness rather than a secondary matter of administrative execution.

A further major result of the analysis is that compliance functions as a public–private governance interface. The report repeatedly shows that the EU sanctions regime does not operate through centralised state enforcement alone. Instead, it relies on a distributed implementation structure in which public authorities, national competent bodies, financial institutions, insurers, exporters, carriers, service providers, and corporate compliance teams all participate in the translation of law into enforceable restraint. In that respect, compliance architecture is one of the clearest manifestations of sanctions as governance rather than as a simple command-and-prohibition system.

This interface operates on several levels. At the first level, public institutions define the normative perimeter through regulations, guidance documents, FAQs, licensing procedures, and enforcement signals. At the second level, private actors convert this perimeter into operational practice by embedding sanctions requirements into internal controls, client onboarding, transaction monitoring, audit procedures, procurement decisions, shipment validation, and contractual architecture. At the third level, feedback from implementation difficulties, circumvention patterns, false positives, and evidentiary gaps returns to public authorities and influences subsequent guidance, clarification, and policy refinement. Compliance thus functions not only as execution, but also as institutional feedback infrastructure.

The significance of this result lies in the fact that the sanctions regime's practical coherence depends on how well this interface functions. Where public rules are formally clear but poorly transmitted, market actors may interpret them unevenly. Where private controls become excessively defensive or inconsistent, the result may be fragmentation rather than disciplined enforcement. Accordingly, the governance quality of sanctions depends in no small measure on the degree of mutual intelligibility between public regulatory intent and private implementation practice. This point is strongly reinforced by the report's emphasis on guidance, implementation quality, and the operational significance of compliance behaviour across sectors.

The results of the report indicate that the compliance architecture of the EU sanctions regime is structured around a set of core instruments that together form the operational

machinery of implementation. These include screening and listing checks, beneficial-ownership verification, trade-control due diligence, export, re-export, and end-use controls, financial and insurance compliance, licensing procedures, internal controls, documentation standards, and audit trails. The report treats these not as peripheral technicalities, but as the primary pathways through which legal restrictions are rendered materially effective.

The first key instrument is screening and identification. Restrictive measures cannot operate in practice unless institutions are capable of identifying sanctioned persons, entities, vessels, corporate structures, and relevant counterparties in a timely and reliable manner. This makes listings checks and ownership scrutiny central to the regime's operational integrity. Secondly, beneficial-ownership verification is especially important because modern sanctions frequently confront layered and opaque structures designed to obscure control, ownership, or functional connection. Thirdly, trade-control due diligence constitutes a core compliance layer where export restrictions, re-export risks, diversion channels, and end-use uncertainties must be assessed before high-risk goods or services circulate.

A fourth instrument concerns financial, payment-system, and insurance compliance, which is structurally significant because many sanctions effects are mediated through banking channels, insurers, risk underwriters, and payment intermediaries. These actors generate what the report elsewhere calls "compliance gravity": the practical extension of restrictive effect beyond the minimum wording of legal text through the regulated caution of intermediaries. Fifthly, licensing, derogations, internal controls, and audit trails are indispensable because a mature sanctions regime must distinguish clearly between prohibited, permitted, and authorisable conduct while retaining an evidence-based record of decision-making and control. In this way, compliance instruments support both restraint and legal-operational accountability.

The analytical value of these findings lies in the fact that they show how sanctions effectiveness depends on the presence of a sufficiently developed implementation chain. A prohibition without screening capacity, ownership visibility, or due-diligence discipline may exist on paper while remaining porous in practice. By contrast, a narrower measure may exert disproportionately strong effect where compliance instruments are well-developed, audit-ready, and supported by coherent guidance and credible enforcement signals (*Council of the European Union, 2018*; *European Banking Authority, 2024*).

The present analysis further demonstrates that the relationship between compliance and anti-circumvention is one of the decisive operational linkages within the sanctions regime. The report states explicitly that, in the anti-circumvention context, effectiveness often depends less on headline prohibitions than on the quality of risk detection, information-sharing, due diligence, and operational follow-through. This is a crucial result because it shows that anti-circumvention is not only a matter of formal legal extension, but of whether institutions can recognise and process evolving patterns of evasion in real time.

This linkage has several implications. First, it means that compliance is not merely the passive application of pre-existing rules. It increasingly performs an anticipatory and diagnostic function, identifying red flags, route anomalies, intermediary dependencies, ownership opacity, and transaction patterns that may indicate re-routing or proxy behaviour. Secondly, anti-circumvention in practice depends on the capacity of institutions to integrate fragmented signals from different domains, including corporate data, shipping information, payment behaviour, export patterns, and counterparty risk assessments. Thirdly, the anti-circumvention value of compliance depends heavily on institutional tempo: if adaptation networks evolve faster than guidance, data fusion, and implementation methods, then enforcement pressure leaks through

substitute corridors. The report makes exactly this point in discussing financial sanctions and bridge-node targeting.

The results therefore confirm that compliance architecture is one of the principal determinants of whether anti-circumvention policy becomes operationally meaningful. In this sense, compliance should be understood not as an after-effect of sanctions law, but as one of the domains through which the regime seeks to maintain strategic relevance under conditions of repeated adaptation. This is especially important for the medium-term horizon of 2026–2030, where the challenge is not simply to adopt additional restrictions, but to sustain a sufficiently rapid and intelligent anti-circumvention cycle across changing networks of intermediation, routing, and facilitation.

A particularly important result of the report is that compliance systems, while indispensable, also generate frictional side effects that may weaken the coherence of the sanctions regime if left unmanaged. The General Introduction explicitly identifies fragmentation, legal uncertainty, defensive de-risking, excessive caution, and uneven burdens across Member States and sectors as major governance concerns. This finding is central to the present article because it shows that compliance is not simply a force multiplier. It is also a potential site of distortion and overreach.

The first such distortion is over-compliance, in which firms, banks, insurers, or service providers adopt an excessively expansive reading of risk in order to avoid liability, reputational exposure, or supervisory criticism. While this may reduce the chance of outright violations, it can also generate unnecessary disruption of lawful activity, narrow protected pathways, and increase costs for legitimate operators. Secondly, defensive de-risking may lead actors to withdraw from borderline but permitted activity altogether, especially where guidance remains general, evidentiary thresholds are unclear, or enforcement signals are perceived as asymmetrical. Thirdly, because compliance architecture is distributed across multiple jurisdictions and sectors, divergence in interpretation, institutional capacity, and supervisory culture can produce fragmentation in the practical application of the same formal rule.

These findings matter because they reveal a central tension within mature sanctions governance. The regime depends on private caution and institutional vigilance, yet too much uncertainty or asymmetry in implementation may encourage behaviour that undermines legal proportionality, policy legitimacy, and administrative manageability. In this regard, the report's emphasis on guidance quality, clearer expectations, and better coordination should be read not as technocratic refinement, but as part of the substantive effectiveness problem. A sanctions regime that appears stringent in formal terms may lose real force if private actors are forced to navigate it through excessive uncertainty or radically divergent enforcement landscapes. This conclusion is also consistent with the emerging academic literature on over-compliance and sanctions-related private-law frictions (*van Essen, 2025*).

The cumulative results support a broader conclusion: compliance capacity is itself a determinant of sanctions effectiveness. This proposition is strongly supported by the report, which repeatedly links the future operability of the sanctions regime to implementation harmonisation, guidance clarity, data fusion, risk detection, and the capacity to sustain governance tempo under conditions of adaptive circumvention. In the report's logic, a regime may be normatively ambitious yet underperform if guidance remains uneven, evidentiary thresholds unclear, or implementation chains too weak to stabilise behaviour across relevant sectors.

Compliance capacity should therefore be understood in a broad institutional sense. It includes not only the formal existence of internal compliance programmes, but the quality of ownership visibility, the reliability of screening systems, the consistency of licensing practice, the

depth of operator guidance, the analytical capability to map intermediary structures, and the coherence of enforcement signals across the Union and aligned partners. It also includes what may be called institutional stamina: the ability to sustain implementation quality over time without succumbing to fatigue, fragmentation, or diminishing alertness in the face of recurrent and technically complex circumvention patterns.

This finding is important because it allows the article to move beyond the narrow assumption that sanctions effectiveness is determined primarily at the moment of legislative design. In reality, the report shows that operational force is co-produced at the level of implementation. A well-designed legal rule without sufficient compliance capacity may remain underenforced. By contrast, a more narrowly framed restriction may become highly consequential where it is embedded in a mature and coordinated implementation architecture. This supports the article's central argument that the long-term effectiveness of the EU sanctions regime depends on the interaction of legal resilience, hybrid reach, and compliance-based operationalisation rather than on formal breadth alone.

The results support several interim conclusions. First, compliance should be understood as the operational transmission mechanism of the sanctions regime rather than as a merely technical add-on. Secondly, compliance architecture functions as a public–private governance interface in which legal norms, administrative guidance, supervisory expectations, and market behaviour are continuously translated into one another. Thirdly, the core instruments of this architecture include screening, listings checks, beneficial-ownership verification, trade-control due diligence, financial and insurance compliance, licensing practice, internal controls, and audit trails. Fourthly, the effectiveness of anti-circumvention policy depends heavily on compliance quality, particularly in relation to risk detection, data integration, and operational follow-through. Fifthly, compliance systems can also generate structural frictions, especially through over-compliance, defensive de-risking, and fragmented implementation. Sixthly, compliance capacity itself emerges as one of the central determinants of the sanctions regime's medium-term effectiveness.

Thus, these findings prepare the transition to the next. If legal resilience explains how the regime remains normatively durable, hybridisation explains how it reaches enabling systems, and compliance explains how restrictive intent is operationalised, the next analytical question concerns the limits of the accumulated sanctions architecture itself. The analysis therefore now turns to the structural constraints of the regime, including complexity, friction, enforcement asymmetry, adaptation, and the risk of diminishing returns.

Structural Limits of the Sanctions Regime: Complexity, Friction, and Governance Risks

The results of the study indicate that the long-term effectiveness of the EU sanctions regime cannot be inferred directly from the quantitative expansion of sanctions packages. The report (*Buychik et al., 2026*) repeatedly cautions that the policy challenge for 2026–2030 is not simply one of adding further measures, but of preserving the quality of the accumulated regime through maintenance, refinement, legal resilience, and governance discipline. In this respect, sanctions expansion and sanctions effectiveness must be treated as analytically distinct variables. A regime may become broader in formal terms while becoming less coherent, less intelligible, or less operationally agile in practice.

This finding follows logically from the preceding analyse. Section 4.2 demonstrated that legal resilience depends on clarity, update capacity, and proportionality. Section 4.3 showed that hybrid instruments derive strength from cross-domain reach but are structurally exposed to attribution problems and fragmentation. Section 4.4 established that compliance systems convert

legal rules into operational restraints, yet may also generate defensive de-risking and uneven burdens. Taken together, these results imply that sanctions architecture matures not merely through proliferation, but through the disciplined management of complexity. Additional measures may close loopholes and intensify pressure, but they may also increase interpretive burden, widen implementation gaps, and strain enforcement capacity if they are not embedded in a sufficiently robust governance environment.

The report's broader analytical framework supports this conclusion by explicitly distinguishing between formal stringency and operational density. A sanctions regime may remain politically impressive on paper while becoming functionally stale if updates slow down, monitoring fragments, and market actors struggle to distinguish clearly between prohibited, permitted, and authorisable conduct. Conversely, a narrower but better-maintained regime may exert more durable pressure because it remains intelligible, governable, and adaptable under changing conditions. The results therefore confirm that the mature stage of sanctions governance requires a shift from expansion logic to calibration logic, in which the central question is not simply how much more can be prohibited, but whether additional restrictions can be integrated without weakening the coherence of the regime itself.

A further major result concerns the problem of structural complexity. The report makes clear that sanctions regimes become harder to stabilise as they accumulate amendments, thematic guidance, derogations, anti-circumvention add-ons, hybrid instruments, and sector-specific compliance expectations. This complexity is not accidental. It is partly the product of policy learning and cumulative adaptation. Yet it also generates a real risk of interpretive overload, especially when public and private actors must navigate large volumes of highly technical rules under conditions of legal exposure and operational urgency.

Interpretive overload matters because sanctions do not operate exclusively at the level of legislative intent. They operate through the practical ability of competent authorities, firms, banks, insurers, carriers, and service providers to understand and apply the regime in a sufficiently consistent way. As the report emphasises, measures that are formally robust at the level of legal drafting may nevertheless underperform if monitoring, implementation, and international coordination remain uneven. In the mature phase of the regime, complexity can therefore become a substantive effectiveness problem rather than a merely technical inconvenience.

The findings suggest three principal manifestations of interpretive overload. First, complex rules may increase decision latency, because operators require more time, documentation, and internal escalation to assess risk. Secondly, they may encourage defensive simplification, whereby lawful but complex transactions are avoided because the compliance cost of distinguishing them from prohibited conduct becomes too high. Thirdly, they may reinforce guidance dependency, making the regime progressively more reliant on FAQs, thematic clarifications, and supervisory interpretation in order to remain workable. These tendencies do not necessarily invalidate sanctions policy, but they do reveal that complexity itself becomes a variable affecting operational coherence. In this regard, the report's repeated call for better drafting, more coherent guidance, and regular review should be understood as a response to interpretive overload as a structural governance risk rather than merely as a stylistic preference.

The present analysis also shows that the sanctions regime remains structurally dependent on a distributed enforcement architecture, and that this dependence creates the risk of enforcement asymmetry. The hybrid section of the report is particularly explicit on this point: implementation and enforcement remain the responsibility of Member States, while practical effectiveness depends on a dispersed field of national authorities, private actors, and partner-

country cooperation rather than on a single central enforcement command. This distributed structure gives the regime reach and flexibility, but it also makes it vulnerable to uneven capacity, fragmented priorities, and evidentiary asymmetry.

The same conclusion is reinforced by the report's treatment of cross-cutting implementation constraints. Across the medium-term horizon, sanctions are constrained less by the formal availability of legal instruments than by coalition throughput capacity, administrative and digital capability, and the ability to maintain legal defensibility and proportionality under sustained scrutiny. These factors are inherently variable across jurisdictions and sectors. As a result, the same formal rule may be implemented with different degrees of intensity, analytical sophistication, and evidentiary caution.

This asymmetry matters for at least three reasons. First, it creates enforcement weak points that can be exploited by adaptive actors through selective routing, jurisdiction shopping, or the concentration of risky activity in less demanding environments. Secondly, it weakens the regime's predictability, because uneven implementation makes it harder for lawful operators to understand which behaviours will be treated as high-risk in practice. Thirdly, it can undermine coalition legitimacy, especially if divergences become visible enough to create the impression that burdens are distributed unequally or that the regime's practical strength depends excessively on a limited number of capable actors. The results therefore confirm that enforcement asymmetry is not a peripheral implementation issue; it is one of the structural limits of sanctions-based coercion in a multi-level governance system.

Another central result concerns the persistent capacity of the targeted system to adapt through re-routing, substitution, and the construction of alternative enabling networks. The report repeatedly warns that visible adaptation should not be read automatically as proof of sanctions irrelevance. At the same time, it also shows that sanctions effectiveness increasingly depends on whether substitute channels become narrower, weaker, and more costly over time, rather than simply on whether adaptation exists in the first place. This is especially evident in the hybrid and compliance sections, where circumvention is treated as a structurally recurring feature of the regime rather than as an exceptional disturbance.

The importance of this finding lies in the fact that adaptation can erode sanctions effectiveness gradually without requiring any formal collapse of the legal regime. Route substitution, shadow logistics, intermediary financial conduits, service-layer fragmentation, and third-country facilitation may preserve substantial operational space even under formally extensive sanctions. The report explicitly identifies the risk that newly constrained nodes may be replaced by functionally equivalent ones, thereby requiring the regime to move from repeated targeting of visible fragments towards intervention against the infrastructures that make replacement possible.

From an analytical standpoint, this means that sanctions should not be judged only by whether they have generated pressure, but by whether they have done so faster than adaptive substitution can stabilise. If substitute channels professionalise more rapidly than controls evolve, the regime may remain formally active while becoming progressively more porous. This finding directly supports the article's broader argument that the sanctions regime should be analysed as a dynamic contest between restriction and adaptation. The structural limit is therefore not adaptation as such, but the possibility that substitute infrastructures may become routine, scalable, and sufficiently low-friction to reduce the marginal effect of further formal tightening.

The results of the report further demonstrate that the long-term viability of the sanctions regime depends not only on pressure against the target state, but also on the preservation of proportionality, legitimacy, and procedural visibility within the sanctioning system itself. This

point is especially important because the report treats safeguards, protected pathways, review mechanisms, de-listing opportunities, humanitarian carve-outs, and clearer interpretive channels not as signs of policy dilution, but as part of the regime's normative foundation. If these safeguards decay in practice, political and legal support for the regime may weaken over time.

This finding is highly consequential for the present analyse. It shows that structural limits are not exhausted by external adaptation or enforcement capacity. There are also internal legitimacy limits within the Union and the wider coalition. Where sanctions become too difficult to interpret, too uneven in effect, or too costly for lawful actors relative to strategic gain, the regime may encounter growing resistance not because its objectives are rejected in principle, but because its operational form appears increasingly disproportionate or procedurally opaque. The report explicitly warns that one of the major durability tests for 2026–2030 will be whether the regime can continue to harden against circumvention without hardening into procedural opacity.

The results also connect this issue to over-compliance and collateral strain. The report's outlook notes that recalibration should be triggered not only by adversary adaptation, but also by coalition slippage, implementation overload, and rising friction imposed on lawful operators or protected channels. This implies that proportionality is not merely a legal doctrine applied ex post by courts. It is a practical governance variable affecting political sustainability, compliance usability, and the regime's capacity to retain internal support across time.

A particularly important result emerging from the report is the risk of diminishing returns in the mature phase of the sanctions regime. The General Introduction states this directly: some measures are likely to retain substantial force because they constrain access to complex technologies, specialist services, capital-intensive renewal, and legally usable economic resources, whereas other measures may face diminishing returns if re-routing routes stabilise, third-country facilitation becomes more entrenched, or private compliance burdens begin to outpace the practical gains of further formal expansion.

This finding should not be interpreted as an argument that sanctions are becoming ineffective in general. Rather, it suggests that the regime enters a phase in which the marginal utility of new restrictions becomes increasingly uneven across domains. Measures aimed at complex technological ecosystems or high-value service infrastructures may continue to generate substantial effect because replacement is difficult and adaptation remains costly. By contrast, measures that repeatedly target easily replaceable nodes, routinised routes, or already saturated layers of prohibition may generate declining returns unless their logic is recalibrated. The report's discussion of recalibration triggers is especially relevant here: when route substitution stabilises, when newly targeted nodes are rapidly replaced, or when intelligence thickens without enforcement conversion, simply adding more of the same may no longer be strategically optimal.

This conclusion is closely connected to sanctions fatigue and compliance fatigue. Where firms become desensitised by volume and complexity, or where the burden of ongoing compliance begins to outweigh perceived gains at the margin, the regime may retain formal reach while losing discriminatory sharpness. Under such conditions, the main policy challenge is no longer maximalist expansion but evidence-led recalibration. The results therefore support a differentiated view of maturity: the accumulated regime may remain strategically valuable overall, yet certain of its components may require redesign, simplification, or retargeting in order to avoid operational staleness and falling marginal effect.

The findings support several interim conclusions. First, the expansion of the sanctions regime does not automatically translate into greater effectiveness; in the mature phase of the regime, governance quality becomes as important as legislative breadth. Secondly, structural complexity can produce interpretive overload, decision latency, and guidance dependency,

thereby affecting operational coherence across the enforcement chain. Thirdly, the sanctions regime remains vulnerable to enforcement asymmetry because it depends on a distributed architecture of national authorities, private actors, and partner-country cooperation rather than on a single central enforcement command. Fourthly, adaptation through re-routing, substitute infrastructures, and intermediary channels remains one of the core structural limits of sanctions-based coercion. Fifthly, proportionality and legitimacy risks are internal constraints of the regime itself: a sanctions system that loses procedural visibility, safeguard accessibility, or protected pathways may weaken politically and legally even while remaining formally stringent. Sixthly, the mature phase of the sanctions regime is marked by the risk of diminishing returns, especially where formal proliferation begins to outpace operational gain.

Thus, these findings prepare the transition to the final section of the Results. If the accumulated regime is constrained by complexity, asymmetry, adaptation, and the possibility of diminishing returns, then the next analytical step is to determine under what conditions it can nonetheless retain strategic value over the medium-term horizon. The analysis therefore now turns to the 2026–2030 outlook, focusing on durability conditions, erosion risks, and recalibration triggers.

The 2026–2030 Outlook: Durability Conditions, Erosion Risks, and Recalibration Triggers

The results of the study indicate that the medium-term horizon of 2026–2030 should not be interpreted primarily through the lens of further formal package accumulation. Rather, the central analytical question is whether the already accumulated sanctions regime can remain strategically relevant, operationally coherent, and institutionally governable under conditions of continued Russian adaptation, intermediary re-routing, and differentiated enforcement capacity. The report (*Buychik et al., 2026*) explicitly frames this future phase not as a simple continuation-or-expiry dilemma, but as a period of managed endurance in which the decisive issue is no longer nominal survival, but the conditions under which survival remains effective, proportionate, and administratively workable.

This conclusion follows directly from the cumulative logic established in the earlier Results. Sanction 4.1 demonstrated that the EU sanctions regime has evolved into an integrated governance architecture rather than a mere sequence of packages. Senction 4.2 showed that its durability depends on legal resilience. Senction 4.3 demonstrated that its adaptive reach increasingly relies on hybrid instruments. Senction 4.4 established compliance as the core transmission mechanism of restrictive pressure. And Senction 4.5 showed that complexity, asymmetry, adaptation, and diminishing returns generate structural constraints within the regime itself. Taken together, these results imply that the next phase of sanctions governance must prioritise maintenance logic over mere expansion logic.

In practical terms, maintenance logic means that the future strength of the regime will depend less on the symbolic value of additional formal prohibitions and more on the Union's capacity to preserve drafting quality, update speed, partner coordination, implementation coherence, and proportionality safeguards. The report's General Introduction states this point with particular clarity: by 2026–2030 the issue is no longer simply the adoption of further packages, but the quality of the accumulated regime and its ability to remain strategically relevant under changing conditions. This makes the outlook section not an appendix to the analysis, but the point at which the internal logic of the entire sanctions architecture becomes most visible.

The report identifies several conditions of durability that are likely to determine whether the sanctions regime retains practical force through 2026–2030. In the legal sphere, one major

stabiliser is the regime's modular renewal structure: overlapping review cycles for different sanctions clusters prevent the entire regime from becoming hostage to a single binary political decision and allow distinct legal tracks to be recalibrated at different speeds. A second stabilising factor is the continued existence of a recognisable legal backbone built around the same foundational acts, especially Regulations 833/2014 and 269/2014, with later packages functioning largely through amendments and selective insertions rather than complete redesign. The report treats this continuity as one of the principal conditions of legal resilience.

In the hybrid domain, the report is even more explicit. It concludes that hybrid sanctions are likely to remain among the most durable elements of the EU regime only if six conditions are maintained together: faster update cycles, continuous network mapping, stronger data-sharing, tighter partner coordination, credible proportionality safeguards, and feedback-based recalibration. This is an especially important result because it translates the earlier conceptual analysis of hybridisation into a practical medium-term governance formula.

These durability conditions also correspond closely to the compliance and governance findings developed in previous subsections. Faster updates are necessary because adaptation networks do not remain static. Continuous network mapping is required because hybrid pressure increasingly targets infrastructures rather than isolated violators. Stronger data-sharing and tighter partner coordination are essential because the practical force of EU measures depends on transnational alignment and on the capacity to narrow external substitute channels. Credible proportionality safeguards matter because a regime that loses legal and political legitimacy may remain formally intact while weakening in coalition support, operator usability, and judicial defensibility. Feedback-based recalibration is indispensable because the mature phase of sanctions governance is necessarily iterative rather than static. Thus, durability is best understood not as endurance by inertia, but as maintained and adaptive governability.

The results of the report also identify several factors of erosion that may weaken the sanctions regime even in the absence of formal rollback. In the legal sphere, one such risk is the continued growth of complexity combined with heavy dependence on post hoc clarification. The report warns that if guidance increasingly has to compensate for unclear legislative drafting or persistent divergent practice, this may indicate that parts of the legal text itself require tightening or rewording rather than further informal supplementation.

A second major erosion factor is the comparative tempo of evasion versus legal and administrative adaptation. The report states this with unusual precision: the regime remains durable only to the extent that it can continue identifying and addressing new circumvention vectors. If the target's adaptation speed begins to exceed the Union's legislative and enforcement response speed, legal resilience may erode even where the formal legal regime remains intact. This finding is central because it links the future of the regime not merely to the existence of restrictive measures, but to their ability to evolve quickly enough in relation to adaptive pressure.

In the hybrid sphere, erosion is likely to manifest through more substitution, more opacity, more uneven enforcement, and more friction falling on lawful rather than targeted actors. This is precisely how the report characterises the weakening of hybrid sanctions where the six durability conditions are not maintained together. Such erosion would not necessarily take the form of public failure or formal repeal. Rather, it would appear through the gradual routinisation of substitute infrastructures, increasing reliance on third-country channels, more fragmented implementation, and a growing mismatch between formal legal ambition and operational effect.

More broadly, the General Introduction suggests that some sanctions tracks may also face diminishing returns if re-routing routes stabilise, third-country facilitation becomes more entrenched, or private compliance burdens begin to outpace the practical gains of additional

formal expansion. This confirms that erosion is not reducible to adversary resilience alone. It may also arise through internal overload, coalition fatigue, regulatory staleness, and declining marginal value of further proliferation.

A particularly valuable result of the report is its explicit development of recalibration triggers. Recalibration, in this framework, should not wait for obvious collapse or demonstrable failure. Rather, it should be triggered when operational indicators suggest that the existing control mix is losing traction or producing disproportionate side effects. The report treats the oil-price-cap review logic as a useful prototype for sanctions governance more generally: review should consider not only implementation and expected results, but also international adherence, informal alignment, and potential impact on the Union and its Member States.

On this basis, the report identifies several key triggers. The first is operational saturation of existing measures. If shadow-fleet listings continue to grow while route substitution stabilises rather than deteriorates, or if newly listed nodes are rapidly replaced by functionally equivalent ones, then the regime should move towards the next layer of enabling infrastructure rather than repeat the same listing pattern. The second trigger is evidentiary thickening without enforcement conversion. If intelligence, red flags, and partner information accumulate but do not translate into faster operational action, then the regime risks becoming descriptively sophisticated but practically passive. The third trigger is widening partner divergence, especially where more permissive shipping, finance, or service hubs outside the EU–G7 orbit begin absorbing functions previously blocked elsewhere. The fourth trigger is rising collateral strain, that is, when lawful operators, humanitarian channels, or basic market functions begin to bear disproportionate friction relative to the anti-circumvention gain achieved.

These recalibration triggers are highly significant for the present article because they confirm that mature sanctions governance requires a shift from reactive escalation to evidence-led adjustment. In analytical terms, recalibration is the mechanism through which the regime attempts to preserve effectiveness without relying on either rigid formal continuity or indiscriminate expansion. It is therefore one of the clearest signs that the EU sanctions regime has evolved into a managed governance architecture.

Taken together, the results support a differentiated strategic forecast for the period 2026–2030. The sanctions regime is likely to remain broadly durable and strategically relevant, but its future effectiveness will be uneven across domains. Measures aimed at access to complex technologies, specialist services, capital-intensive renewal, sensitive financial channels, and legally usable economic resources are likely to retain substantial force because substitution in these areas remains difficult, costly, or qualitatively inferior. By contrast, sanctions tracks operating in routinised or more easily replaceable spaces may face greater risks of diminishing returns unless they are redesigned to target the infrastructures that enable substitution rather than merely its visible outputs.

The forecast is therefore neither one of imminent collapse nor one of automatic cumulative victory. Rather, it is one of conditional durability. The report's formulation is especially instructive here: the decisive issue is not whether hybrid sanctions, or indeed the wider regime, can survive as legal instruments; it is whether they can remain operationally faster and institutionally smarter than the networks they are designed to constrain. This proposition can be generalised to the regime as a whole. The future effectiveness of EU sanctions will depend on whether the Union and its partners can preserve strategic tempo, maintain institutional coherence, and direct pressure not only at prohibited transactions but at the infrastructures that make sustained adaptation possible.

In this sense, the 2026–2030 outlook is best characterised as a contest between two moving architectures: on the one hand, the evolving sanctions regime of the Union and aligned partners; on the other, the evolving adaptation systems of the targeted state and associated intermediary networks. The more successfully the former preserves legal resilience, hybrid adaptability, compliance quality, and recalibration discipline, the more likely it is to remain effective over the medium term.

The Results section as a whole yields a coherent set of findings. First, the EU sanctions regime against the Russian Federation has developed into an integrated governance architecture whose practical force is produced cumulatively through the interaction of political, economic, social, legal, hybrid, and compliance dimensions. Secondly, its long-term durability depends centrally on legal resilience, understood as the capacity of the regime to remain clear, defensible, updateable, and proportionate under prolonged strategic pressure. Thirdly, hybridisation has become a defining feature of the mature regime because significant parts of contemporary pressure now operate through cross-domain intervention against enabling infrastructures rather than through direct prohibitions alone. Fourthly, compliance functions as the operational transmission mechanism through which law becomes behavioural restraint across public and private governance structures. Fifthly, the regime faces real structural limits, including complexity, interpretive overload, enforcement asymmetry, adaptive substitution, legitimacy risks, and the possibility of diminishing returns. Sixthly, the medium-term outlook is neither a simple continuation of current practice nor a question of formal survival alone; it is a question of whether the accumulated regime can be maintained through faster updating, stronger coordination, credible safeguards, and evidence-led recalibration.

Thus, these results establish the analytical basis for the next major section of the article. Having identified the main empirical and structural findings of the study, it is now necessary to interpret them more explicitly at the theoretical and policy levels. The discussion that follows therefore moves from descriptive-analytical reconstruction to conceptual interpretation, assessing what these findings imply for the broader theory of sanctions effectiveness, for the understanding of sanctions as governance, and for the future development of the EU sanctions regime.

Discussion

The findings of the study strongly suggest that the effectiveness of the EU sanctions regime against the Russian Federation cannot be adequately interpreted through the classical binary opposition of success and failure. This conclusion places the article in critical dialogue with a substantial part of the traditional sanctions literature, in which effectiveness is frequently assessed in relation to a relatively narrow benchmark: whether sanctions compel the target state to reverse or substantially modify a contested policy within a reasonably short time frame (*Hufbauer et al., 2009*; *Pape, 1997*). Such an approach has analytical value in cases where sanctions are limited, discrete, and directed towards a clearly defined concession. However, it becomes increasingly inadequate in the case of a mature and cumulative sanctions regime whose objectives are distributed across coercive, degradational, deterrent, coordinative, and legitimising functions rather than concentrated in a single event of policy reversal.

The Results has demonstrated that the EU sanctions regime now operates as an integrated governance architecture rather than as a temporary instrument of episodic economic pressure. This has two important implications for the interpretation of effectiveness. First, effectiveness must be assessed as a multidimensional phenomenon, since different components of the regime may perform differently across political, legal, economic, hybrid, and compliance-related

domains. Secondly, effectiveness must be treated as institutionally mediated, because the real force of restrictive measures depends not only on their formal adoption, but on legal resilience, hybrid reach, compliance quality, partner coordination, and the capacity to adapt faster than circumvention networks evolve. In this respect, the study's findings support a shift from outcome minimalism towards a broader concept of sanctions effectiveness grounded in institutional durability and cumulative pressure production.

This reinterpretation does not require abandoning the classical literature on sanctions. On the contrary, the study confirms that the concerns raised by earlier scholarship remain highly relevant. Drezner's (*1999*) emphasis on strategic interaction, Hufbauer et al.'s (*2009*) attention to measurable pressure, and Pape's (*1997*) scepticism regarding coercive success all continue to illuminate important dimensions of sanctions policy. Yet the findings of the present article indicate that these approaches capture only part of the contemporary reality of EU sanctions governance. In the Russian case, the most analytically significant question is no longer simply whether sanctions have produced immediate behavioural reversal at the level of grand strategy. The more revealing question is whether the sanctions regime has been able to constrain resources, degrade complex forms of access, narrow the space for low-cost adaptation, sustain coalition discipline, and maintain normative and operational coherence over time. These are not secondary effects. They are central dimensions of effectiveness in a prolonged sanctions environment.

The article's results also suggest that the success–failure dichotomy may inadvertently obscure the temporal structure of sanctions impact. Some effects are immediate and visible, especially in the domains of signalling, asset immobilisation, and financial disruption. Others are slower, cumulative, and more difficult to attribute to a single measure, particularly where the relevant processes concern technological deprivation, service-layer erosion, rising adaptation costs, or the degradation of legally usable economic resources. Still others are reflexive and governance-based: they concern the Union's capacity to preserve legal resilience, to maintain implementation discipline, and to refine the regime in response to emerging circumvention patterns. When these different temporalities are collapsed into a single verdict of "worked" or "did not work", the analytical richness of the regime is lost.

From this perspective, the findings support a more differentiated interpretative formula: the effectiveness of the EU sanctions regime should be understood as the degree to which it produces sustained and cumulative constraint across multiple channels while preserving its legal and institutional governability. This definition is more appropriate to a regime that has become deeply embedded in European regulatory practice and increasingly relies on iterative maintenance rather than one-off coercive demonstration. It also aligns with the report's underlying logic, which consistently treats the regime as a managed system of pressure, adaptation, review, and recalibration rather than as a one-dimensional mechanism of immediate political compellence.

A further implication of this reinterpretation is that sanctions effectiveness must be analysed in relation to relative strategic tempo. The Results showed repeatedly that the regime's future value depends not on the abstract existence of restrictive measures, but on whether legal adaptation, hybrid targeting, and compliance-based enforcement can remain operationally faster and institutionally more coherent than the evolving networks of evasion and substitution. This means that effectiveness is not a static state but a moving relation between two changing architectures: the architecture of restriction and the architecture of adaptation. Under such conditions, the most meaningful analytical distinction is not between total success and total failure, but between more resilient and less resilient forms of sanctions governance.

Accordingly, the discussion arising from the study suggests that sanctions research should move towards a framework in which effectiveness is evaluated through a set of interrelated questions: whether the regime remains legally defensible, whether it preserves operational clarity, whether it disrupts enabling infrastructures, whether it translates norms into behaviour through sufficiently strong compliance systems, and whether it can recalibrate faster than circumvention becomes routine. Such a framework does not romanticise sanctions or assume their automatic success. Rather, it offers a more realistic and theoretically adequate way of analysing a mature sanctions regime whose performance is cumulative, differentiated, and institutionally conditioned. This broader interpretative shift provides the necessary basis for the next part of the Discussion, which turns to legal resilience as one of the article's central explanatory variables.

One of the most important theoretical implications of the study is that legal resilience should be treated as a core explanatory variable of sanctions effectiveness rather than as a secondary doctrinal or procedural consideration. The Results demonstrated that the long-term operability of the EU sanctions regime depends not merely on the formal existence of prohibitions, but on the capacity of the legal framework to remain intelligible, reviewable, adaptable, and proportionate under prolonged geopolitical pressure. This finding substantially extends the conventional legal treatment of sanctions, which has often focused on validity, competence, or judicial review in a narrower sense without fully integrating these issues into broader explanations of regime durability and effectiveness.

In the context of the present article, legal resilience performs an explanatory role because it links normative design to operational continuity. A sanctions regime that is legally fragile may still appear forceful in the short term, but it is unlikely to remain effective over time if it generates persistent ambiguity, excessive litigation exposure, fragmented implementation, or widening divergence between formal rules and practical applicability. By contrast, a regime characterised by disciplined drafting, intelligible derogation structures, judicial defensibility, and coherent update capacity is better equipped to sustain pressure over an extended period. In this sense, legal resilience explains not only whether sanctions can be adopted, but whether they can continue to function as a governable and credible system of restrictive pressure.

This conclusion also allows a more precise reinterpretation of the relationship between law and effectiveness in sanctions studies. In a considerable part of the earlier literature, legal analysis appears implicitly subordinate to strategic analysis: law is treated either as the formal container of policy choices or as a constraint external to them. The findings of the study suggest a different view. In the EU case, law is not merely the vessel of sanctions policy. It is one of the principal media through which the regime acquires durability, institutional coherence, and operational reach. Legal resilience therefore does not simply limit sanctions governance; it helps to constitute it. This is especially evident in the report's treatment of legal sanctions as a normative and institutional regime comprising legislative, interpretative, administrative, enforcement, and judicial layers rather than a narrow body of prohibitory text.

A further point of theoretical significance is that legal resilience helps explain why formal stringency and actual effectiveness may diverge. A sanctions regime may appear stricter as it accumulates more prohibitions, broader categories, and denser obligations. Yet if such expansion is accompanied by reduced clarity, interpretive overload, unstable derogation design, or increasing dependence on external guidance to keep the system workable, then formal stringency may mask a weakening of legal-operational quality. The Results showed precisely this risk in the mature phase of the EU regime. Legal resilience therefore provides a more discriminating explanatory lens than breadth alone, because it captures whether sanctions remain legally

actionable and administratively sustainable rather than simply whether they have become more extensive.

This analytical role becomes even more important when sanctions are expected to function over a medium-term horizon, as in the 2026–2030 outlook developed in the Results. Under such conditions, the decisive issue is not whether the legal framework can sustain one round of pressure, but whether it can survive repeated cycles of amendment, clarification, circumvention response, and judicial scrutiny without losing coherence. In this respect, legal resilience is closely linked to what may be called regulated adaptability: the ability of the legal regime to evolve without dissolving into instability or excessive fragmentation. The report's repeated emphasis on update capacity, clearer drafting, better codification of recurring clarifications, and stronger proportionality safeguards strongly supports this interpretation.

The findings also suggest that legal resilience mediates the relationship between the other two central variables of the article, namely hybridisation and compliance capacity. Hybrid instruments expand the reach of sanctions into enabling infrastructures and cross-domain networks, but their legitimacy and sustainability depend on whether the legal framework remains sufficiently precise and reviewable. Compliance systems translate sanctions into day-to-day behavioural restraints, but their coherence depends heavily on whether the underlying legal architecture is intelligible and proportionately structured. In this way, legal resilience does not operate in isolation; it acts as a stabilising condition for the wider sanctions architecture. Without it, hybrid reach may become legally vulnerable and compliance translation may become fragmented or excessively defensive. This relational role confirms that legal resilience is not merely one factor among others, but one of the principal structuring conditions of the regime as a whole.

Another implication of the present findings is that judicial review should be understood not only as a source of pressure on the sanctions regime, but as one of the mechanisms through which legal resilience is formed and maintained. The Results showed that litigation pressure compels greater evidentiary discipline, more careful drafting, and clearer articulation of proportionality and legitimate aim. This means that review does not merely test the regime after the fact; it shapes the quality of the regime prospectively. From this standpoint, legal resilience is partly produced through the interaction between legislative design and anticipated judicial scrutiny. The regime becomes stronger not despite review, but in part because review disciplines the terms under which restrictive policy is institutionalised. This finding is particularly important for a European context, where the legitimacy and sustainability of sanctions depend heavily on their continued embeddedness within the Union's rule-of-law order (*Lonardo, 2023*).

At a broader theoretical level, the emphasis on legal resilience contributes to a shift in sanctions research from a model centred primarily on pressure intensity to one centred also on institutional sustainability. A sanctions regime that generates immediate disruption but cannot preserve clarity, update speed, procedural fairness, or legal defensibility may impose costs in the short term while eroding its governability in the medium term. By contrast, a legally resilient regime may generate more disciplined and cumulative effects even without spectacular immediate outcomes, precisely because it remains capable of being applied, defended, refined, and internalised over time. This supports one of the central claims of the article: in a prolonged confrontation, the durability of sanctions depends not only on how hard they hit, but on how well they are legally built and maintained.

For these reasons, the findings justify treating legal resilience as one of the article's principal conceptual contributions. It provides a category capable of integrating clarity, proportionality, judicial defensibility, derogation design, enforcement convergence, and update capacity into a

single explanatory framework. At the same time, it avoids reducing legal analysis to technical formalism, because it links those legal qualities directly to the practical question of whether the sanctions regime can continue to produce meaningful restrictive effects over time. In turn, this creates the bridge to the next part of the Discussion, where the focus shifts from the legal durability of the regime to the broader transformation of sanctions into cross-domain governance through the process of hybridisation.

The findings of the study suggest that one of the most consequential transformations in contemporary sanctions policy is the shift from sanctions as predominantly sectoral restrictions towards sanctions as a form of cross-domain governance. This shift is particularly visible in the EU sanctions regime against Russia, where the practical force of restrictive policy increasingly depends on the ability to act simultaneously across law, finance, transport, insurance, technological support, advisory services, documentation, routing channels, and networked intermediary structures. The analytical report captures this transformation with considerable precision by showing that hybrid measures have become central not because they are merely broader than conventional sanctions, but because they are better adapted to a long-running contest of evasion and counter-evasion in which the target's adjustment mechanisms are themselves transnational, modular, and constantly evolving.

This conclusion has important theoretical implications. Classical sanctions theory has generally relied on distinctions between political, economic, legal, and administrative instruments. Such distinctions remain analytically useful, and the present article does not seek to abolish them. However, the Results section has shown that, in the mature phase of the EU sanctions regime, a growing number of restrictive measures derive their practical effect from interactions across several of these domains at once. The report makes clear that hybrid measures are not simply sanctions with many side effects; rather, they are measures whose operative mechanism is constitutively cross-domain. Their coercive value depends on the interaction of multiple regulatory and infrastructural layers, so that law, market withdrawal, service denial, due-diligence intensification, and route disruption work together as part of a single restrictive logic.

From this perspective, hybridisation changes not only the design of sanctions, but the very ontology of sanctions governance. The primary target is no longer always a clearly identifiable prohibited act or a discrete exchange. Increasingly, the target becomes an enabling system: a routing corridor, a service ecosystem, a shadow infrastructure, a proxy ownership chain, or a network of facilitators that makes circumvention scalable and repeatable. This means that sanctions governance is progressively moving away from a model centred exclusively on direct prohibition and towards a model concerned with constraining the organisational and infrastructural conditions that make adaptation possible. The report's emphasis on maritime routing, shadow-fleet support structures, contractual re-export clauses, due-diligence obligations, and network-based tools illustrates this shift very clearly.

A particularly important implication of this transformation is that the comparative strength of hybrid sanctions lies in their flexibility and adaptive responsiveness. The report explicitly identifies these features as among the principal comparative advantages of hybrid measures. Because hybrid instruments can absorb operational feedback, respond incrementally to circumvention, and connect separate sanctions domains without full regime redesign, they are especially well suited to an environment in which evasion techniques change faster than stable sectoral redesign can reasonably follow. This is a major theoretical finding, because it suggests that the most effective parts of a mature sanctions regime may not be those that are formally the harshest, but those that are the most institutionally agile and capable of preserving pressure under moving-target conditions.

At the same time, the study also indicates that hybridisation should not be interpreted as the disappearance of older sanctions categories. The report is explicit on this point: hybrid measures do not replace political, economic, legal, or compliance measures; rather, they connect and intensify them. This is a crucial distinction. Hybrid sanctions do not constitute an autonomous sanctions universe detached from the rest of the regime. Their power derives precisely from their ability to make existing domains reinforce one another. A legal prohibition becomes more consequential when it is linked to service denial; an anti-circumvention tool becomes more potent when it is supported by due-diligence obligations, maritime-service restrictions, and financial controls; a contractual clause acquires greater strategic value when it is embedded in a wider network of guidance, enforcement expectations, and partner coordination. Hybridisation therefore does not dissolve differentiation within the sanctions regime; it reorganises that differentiation into a more tightly connected architecture.

This also helps explain why anti-circumvention architecture has become so central to sanctions governance. The Results showed that anti-circumvention functions as a bridge category between hybrid instruments and compliance systems. The report reinforces this interpretation by showing that hybrid measures are especially strong where they can close loopholes precisely, target concrete leakage points, and cumulatively strengthen the anti-circumvention architecture without requiring a wholesale redesign of the regime. In theoretical terms, this means that the effectiveness of sanctions increasingly depends not on sealing the system once and for all, which is impossible, but on the capacity to keep the system dynamically governable as new adaptation pathways appear. Hybrid governance is therefore iterative by design: it is built to respond to recurring leakage rather than to presume static compliance conditions.

Yet the transformation of sanctions into cross-domain governance also introduces serious tensions. The same report that highlights the strengths of hybrid measures also emphasises that they operate in terrains where proof is least linear, enforcement is least uniform, and lawful activity is hardest to distinguish cleanly from sanctions-relevant facilitation. This is theoretically significant because it shows that hybridisation expands not only regulatory reach, but also governance vulnerability. The more sanctions act against infrastructures and indirect facilitation chains, the more they depend on network mapping, evidentiary synthesis, partner-country cooperation, and operational judgement under uncertainty. As a result, hybrid governance is powerful precisely because it reaches enabling systems, but it is also more exposed to fragmentation, attribution difficulties, legitimacy concerns, and collateral friction than narrower forms of restriction.

The medium-term outlook developed in the Results strengthens this interpretation. The report concludes that hybrid measures are likely to remain among the most durable elements of the EU regime only if several conditions are maintained together: faster update cycles, continuous network mapping, stronger data-sharing, tighter partner coordination, credible proportionality safeguards, and feedback-based recalibration. This formulation is theoretically important because it shows that hybridisation should not be understood as a stable property acquired once and for all. It is a mode of governance that remains effective only when supported by an adequately agile institutional environment. If that environment weakens, the likely outcome is not formal collapse, but gradual erosion through more substitution, more opacity, more uneven enforcement, and more friction falling on lawful rather than targeted actors.

Accordingly, the findings of the study support a broader theoretical proposition: contemporary sanctions, at least in the EU–Russia case, should increasingly be analysed as cross-domain governance systems directed against adaptive infrastructures rather than merely as sets

of prohibitory acts directed against static violations. This does not mean that direct prohibitions have lost importance. It means that their effectiveness now depends to a much greater extent on how they are embedded in wider architectures of service denial, route disruption, data-sharing, due diligence, network targeting, and coalition coordination. Hybridisation is therefore not a marginal refinement of sanctions policy. It is one of the principal mechanisms through which sanctions have been transformed into a durable and adaptive form of governance under conditions of prolonged geopolitical confrontation. This conclusion provides the basis for the next part of the Discussion, where the focus shifts to compliance as the missing link in much of the traditional theory of sanctions effectiveness.

The findings of the study suggest that compliance occupies a structurally under-theorised position in much of the traditional literature on sanctions effectiveness. Classical sanctions theory has generally concentrated on three principal levels of analysis: the strategic intentions of sanctioning states, the macroeconomic impact on the targeted economy, and the political response of the targeted government. These approaches have generated a substantial body of valuable scholarship, yet they have often left insufficiently examined the practical transmission chain through which sanctions are converted from formal legal restrictions into everyday constraints on payments, logistics, insurance, ownership structures, advisory services, trade documentation, and commercial decision-making. The Results section showed that, in the case of the EU sanctions regime against the Russian Federation, this transmission chain is neither marginal nor merely technical. It is one of the principal determinants of whether sanctions remain operationally meaningful over time.

This has important consequences for sanctions theory. If compliance is treated merely as an implementation detail, then the analysis risks overstating the explanatory power of legal adoption or macroeconomic pressure alone. A formally robust sanctions package may appear strong in doctrinal or political terms, yet produce uneven practical effects if its obligations are poorly translated into screening systems, ownership verification practices, contractual controls, shipping procedures, risk models, and licensing decisions. Conversely, a narrower or more targeted measure may become highly consequential if it is embedded in a mature compliance environment capable of rapidly internalising regulatory intent. In this sense, the study suggests that compliance is the missing intermediate variable between sanctions as law and sanctions as material constraint. Without it, the causal pathway from restriction to effect remains analytically incomplete.

The report's treatment of compliance supports this interpretation particularly strongly. It repeatedly emphasises that sanctions influence behaviour not simply because rules exist, but because those rules are translated into operational routines across public and private institutions. This translation includes client screening, beneficial-ownership checks, risk escalation, export and re-export due diligence, insurance scrutiny, payment controls, licensing review, and the generation of audit-ready records. These practices are not ancillary to the regime; they are the machinery through which restrictive intent acquires force in transnational economic relations. The results therefore indicate that compliance should be theorised not as the final stage of sanctions policy, but as one of its constitutive dimensions.

A further implication is that compliance helps explain why sanctions effectiveness is so uneven across jurisdictions, sectors, and time horizons. Traditional theory has often attributed variation in effectiveness primarily to the will of governments, the structure of the targeted economy, or the cohesion of sanctioning coalitions. These factors remain important, but the study shows that variation also arises within the implementation chain itself. Differences in supervisory culture, institutional capacity, data availability, ownership transparency, operator

sophistication, and guidance quality may lead to major differences in how the same formal rule is applied in practice. This means that sanctions effectiveness is partly conditioned by the quality of distributed enforcement infrastructure. A regime that is coherent in formal terms may still be operationally patchy if compliance capacity remains fragmented across sectors and Member States.

This also clarifies the relationship between compliance and anti-circumvention policy. The Results section demonstrated that anti-circumvention increasingly depends not only on legal extension, but on the ability of institutions to detect red flags, integrate dispersed signals, and respond quickly to emerging patterns of route substitution and intermediary facilitation. In theoretical terms, this means that compliance is not simply a defensive apparatus ensuring passive conformity. It is also an anticipatory and diagnostic capability through which the sanctions regime interprets evolving risk landscapes. This point is especially important in the EU–Russia context, where a considerable share of practical enforcement pressure depends on the capacity to identify opaque ownership structures, routing anomalies, and service-layer facilitation before they become stabilised components of alternative infrastructures. Compliance therefore contributes not only to enforcement, but also to the epistemic dimension of sanctions governance: it helps the regime know where pressure should next be applied.

At the same time, the findings of the study show that compliance cannot be romanticised as a neutral force multiplier. The report is explicit that compliance systems can also generate serious side effects, including over-compliance, defensive de-risking, fragmentation, and disproportionate burdens on lawful actors. This is theoretically significant because it demonstrates that compliance is not simply a channel of stronger enforcement; it is a field of governance in which restrictive intent is interpreted, filtered, and sometimes expanded beyond the narrow wording of formal norms. In other words, compliance does not merely carry sanctions into practice; it also reshapes the practical meaning of sanctions through institutional caution, market risk logic, and asymmetric supervisory expectations. This helps explain why the regime's operational reality may diverge from its formal legal text.

For sanctions theory, this implies that compliance should be conceptualised as a public–private governance interface rather than as a passive downstream function. It is at this interface that the state's restrictive objectives encounter corporate risk management, banking governance, insurance discipline, logistics screening, and contractual architecture. This is also where legal clarity, evidentiary sufficiency, and guidance quality become practically decisive. A compliance-centred perspective therefore strengthens the article's broader argument that sanctions effectiveness is institutionally mediated. The real question is not only whether the sanctioning authority has adopted restrictive measures, but whether it has built and maintained a sufficiently coherent environment in which public norms can be translated into private restraint without dissolving into legal uncertainty or excessive collateral friction.

This perspective also helps explain why compliance capacity should be treated as one of the central variables in the medium-term outlook. A sanctions regime entering its mature phase cannot rely indefinitely on legislative proliferation alone. If the implementation chain becomes fatigued, overburdened, or too fragmented to sustain meaningful differentiation between high-risk and lawful activity, the regime may remain formally active while losing practical sharpness. By contrast, where compliance architecture remains adaptive, well-guided, data-supported, and proportionately governed, sanctions may continue to produce significant effects even in the presence of persistent circumvention attempts. This confirms one of the article's central claims: in prolonged sanctions environments, the effectiveness of restrictive policy depends not only on what is prohibited, but on how reliably and intelligently those prohibitions are operationalised.

Accordingly, the study supports the proposition that compliance is indeed the missing link in much of traditional sanctions theory. It connects law to behaviour, connects prohibition to risk management, connects anti-circumvention strategy to day-to-day institutional practice, and connects formal regime design to actual economic constraint. Bringing compliance into the theoretical centre of sanctions analysis does not displace the importance of coercion, signalling, or economic pressure. Rather, it explains how those broader strategic functions are made operational in a contemporary regulatory environment characterised by distributed enforcement, complex market intermediation, and adaptive networks of evasion. This conclusion leads directly to the next part of the Discussion, which considers the broader theoretical implications of the study for sanctions research as a whole.

The findings of the study give rise to several broader theoretical implications for sanctions research. Most fundamentally, they suggest that contemporary sanctions—at least in the EU–Russia case—should no longer be analysed primarily as discrete acts of external pressure, but as institutionally layered systems of governance whose effectiveness depends on the interaction of legal design, infrastructural reach, and operational implementation. This conclusion extends beyond the specific empirical case examined here. It indicates that sanctions studies may need to move away from analytical frameworks centred predominantly on state intent, macroeconomic cost, or short-term behavioural response, and towards frameworks capable of explaining how restrictive regimes function as durable, adaptive, and internally differentiated policy architectures.

A first theoretical implication concerns the unit of analysis. Much of the traditional literature has implicitly treated the relevant unit as the sanction episode, the sanctions package, or the coercive encounter between sender and target. The study suggests that, in mature sanctions environments, the more appropriate unit is often the regime architecture itself. This is because the practical force of sanctions is generated cumulatively through successive amendments, interpretative guidance, enforcement practices, hybrid extensions, compliance routines, and partner coordination rather than through the isolated content of a single measure. In such contexts, analysing an individual package in isolation may reveal less about effectiveness than analysing the institutional logic through which multiple measures are stabilised, updated, and made mutually reinforcing over time.

A second implication concerns the conceptual structure of effectiveness. The article has argued that effectiveness should be understood as multidimensional and institutionally mediated. This implies that sanctions studies should distinguish more clearly between different forms of effectiveness: coercive, degradational, deterrent, coordinative, legitimising, and governance-stabilising. The significance of this distinction is theoretical as well as empirical. It helps to explain why sanctions may be ineffective in one sense—for example, in immediately compelling policy reversal—while still remaining highly consequential in another, such as degrading access to specialist services, narrowing low-cost adaptation pathways, preserving coalition discipline, or maintaining the normative and legal coherence of a restrictive regime. This broader conceptualisation does not dilute the meaning of effectiveness. It makes that meaning more precise in relation to the actual complexity of prolonged sanctions governance.

A third implication is the article's proposal of a more integrated explanatory model based on three central variables: legal resilience, hybrid adaptability, and compliance capacity. These variables should not be viewed as separate explanatory tracks. The Results and Discussion sections suggest that their analytical value lies precisely in their interaction. Legal resilience explains whether the regime can remain intelligible, defensible, and updateable. Hybrid adaptability explains whether the regime can reach enabling systems and respond to changing

patterns of circumvention without depending exclusively on static direct prohibition. Compliance capacity explains whether restrictive intent is translated into sufficiently reliable behavioural restraint across the public–private implementation chain. Taken together, these variables offer a framework for explaining why some sanctions regimes retain operational force over time while others become legally fragile, strategically stale, or implementation-poor despite formal breadth.

This triadic model also has implications for the relationship between law and power in sanctions studies. Traditional approaches have often tended to privilege either coercive capability or economic leverage, with law appearing chiefly as a formal instrument or external constraint. The study suggests a different theoretical position: law is one of the principal media through which sanctions acquire durability and governability; hybridisation is one of the means through which sanctions acquire adaptive reach; and compliance is one of the means through which sanctions acquire operational reality. In this sense, the effectiveness of sanctions is not simply a function of how much pressure can be declared, but of how pressure is institutionally organised, legally sustained, and practically transmitted. This marks a shift from a model of sanctions as episodic statecraft towards a model of sanctions as regulated power exercised through governance infrastructures.

A fourth implication concerns temporality. The analysis developed in this article suggests that sanctions research should take much more seriously the fact that mature sanctions regimes operate across multiple temporal horizons at once. There are immediate effects, such as signalling, market shock, or asset immobilisation. There are medium-term effects, such as erosion of technologically or financially mediated capabilities. And there are iterative governance effects, such as regulatory learning, recalibration, guidance refinement, and shifting anti-circumvention practice. This means that sanctions effectiveness is not simply a question of whether a policy "works" at a given moment, but whether the regime can preserve strategic tempo in relation to adaptation. The theoretical consequence is significant: effectiveness becomes a processual and relational category, not a one-time verdict.

A fifth implication concerns the role of adaptation in sanctions theory. Classical models have frequently treated circumvention and substitution as complications that reduce the force of sanctions. The study suggests a more nuanced interpretation. Adaptation is not merely a source of policy failure; it is one of the normal conditions under which a mature sanctions regime operates. The theoretical question is therefore not whether adaptation exists, but whether the sanctions architecture can respond to it quickly enough, precisely enough, and proportionately enough to prevent substitute systems from becoming fully stabilised. This reframes sanctions governance as an iterative contest between two moving systems: one of restriction and one of adaptation. Such a perspective is especially well suited to regimes that persist over several years and evolve through repeated cycles of evasion and counter-evasion.

A sixth implication is methodological. The study indicates that sanctions research may benefit from combining legal analysis, political economy analysis, governance analysis, and compliance-centred implementation analysis within a single interpretative framework. No one of these approaches, taken alone, appears sufficient for explaining the mature EU sanctions regime. A purely economic reading underestimates legal-operational quality; a purely legal reading underestimates adaptation and market mediation; a purely strategic reading underestimates implementation chains; and a purely compliance-oriented reading risks losing sight of the wider normative and geopolitical architecture. The theoretical value of the present article lies partly in showing that sanctions studies may require more explicitly interdisciplinary

explanatory models if they are to account for the realities of complex transnational restrictive regimes.

Finally, the findings of the study suggest that sanctions scholarship should become more attentive to the concept of institutional sustainability. In prolonged confrontations, the decisive question is not only whether sanctions can impose costs, but whether the sanctioning system can maintain clarity, legitimacy, coordination, implementation discipline, and adaptive capacity without undermining its governability. This introduces a more reflexive dimension into sanctions theory: the sanctioning regime itself becomes an object of analysis, not merely the behaviour of the sanctioned state. In the EU case, this is especially important because the regime's strategic value depends in part on whether it remains compatible with the Union's rule-of-law commitments, proportionality standards, and multi-level enforcement structure. Sanctions effectiveness, in other words, is partly a function of the sanctioning system's ability to reproduce itself as a coherent order of governance over time.

Taken together, these implications point towards a broader reorientation of sanctions studies. This article does not reject classical theories of coercion, economic statecraft, or deterrence; rather, it suggests that these theories are no longer sufficient on their for explaining highly institutionalised sanctions regimes such as that of the European Union against Russia. A more adequate theory must account for law as a medium of durability, hybridisation as a medium of adaptive reach, compliance as a medium of operationalisation, and institutional sustainability as a condition of long-term effectiveness. This theoretical synthesis, in turn, provides the basis for the next part of the Discussion, which turns from conceptual implications to the more practical question of what the findings mean for the future development of the EU sanctions regime itself.

The findings of the study carry several important implications for the future development of the EU sanctions regime against the Russian Federation. Most fundamentally, they suggest that the strategic value of the regime will depend less on the continued symbolic accumulation of restrictive packages than on the Union's ability to improve the quality of sanctions governance. This conclusion follows directly from the Results section, which showed that the mature phase of the regime is characterised by growing complexity, adaptive circumvention, enforcement asymmetry, and the risk of diminishing returns. In such conditions, policy effectiveness is no longer secured simply by adding further prohibitions. It depends on whether the accumulated architecture can be maintained in a manner that remains legally resilient, operationally coherent, and institutionally adaptive.

A first policy implication concerns drafting discipline and legislative intelligibility. The analysis has shown that legal resilience is one of the core determinants of long-term effectiveness. From a policy perspective, this means that the Union should continue to move away from excessive dependence on post hoc clarification and towards clearer legislative formulation, more coherent article structure, and better codification of recurrent interpretative issues. The report (*Buychik et al., 2026*) explicitly indicates that persistent reliance on heavy guidance may become a sign that parts of the legal text itself require rewording or more standardised derogation design. In practical terms, the implication is straightforward: a sanctions regime that remains too dependent on secondary clarification risks increasing operator uncertainty, encouraging defensive over-compliance, and weakening uniform implementation across Member States.

A second implication concerns update speed and modular recalibration. The results strongly suggest that, in the 2026–2030 period, the Union's comparative advantage will depend on whether sanctions law and implementation practice can evolve faster than circumvention networks stabilise. The report treats faster update cycles as one of the six core conditions of

durability for hybrid sanctions, and the same logic is applicable to the broader regime. Policy-wise, this implies that the EU should privilege shorter review cycles, modular amendments, and faster integration of operational intelligence into legal and administrative responses. A mature sanctions regime should not wait for obvious failure before recalibrating. Instead, it should respond when operational indicators show update lag, replaceability of targeted nodes, or widening divergence between regulatory design and practical effect.

A 3rd implication concerns partner coordination and coalition geography. The study has repeatedly shown that the EU regime is not self-sufficient in operational terms. Its force depends heavily on alignment with partner jurisdictions, especially in finance, transport, insurance, and service-related sectors. The report identifies tighter partner coordination and stronger data-sharing among the core durability conditions of hybrid sanctions. It also warns that widening partner divergence should itself be treated as a recalibration trigger. The practical implication is that sanctions policy should devote at least as much attention to maintaining coalition breadth and reducing external substitute channels as to formal internal tightening. Where important external jurisdictions begin to absorb blocked functions at scale, the Union may need to combine tighter nexus-based controls with renewed alignment diplomacy and more targeted network-based measures.

A 4th implication concerns continuous network mapping and infrastructure-centred targeting. The Results section demonstrated that hybrid sanctions are most effective when they target enabling infrastructures rather than repeatedly targeting easily replaceable visible nodes. This is reflected very clearly in the report's discussion of recalibration triggers, which states that when newly listed vessels, banks, exchanges, or firms are rapidly replaced by equivalents, the regime should move towards the infrastructure that makes replacement possible. From a policy standpoint, this implies that sanctions design should increasingly prioritise network logic over static enumeration. Such an approach requires sustained investment in mapping logistics chains, ownership structures, service ecosystems, and intermediary hubs. Without this, the regime risks remaining legally active while strategically chasing fragments of a continuously adapting system.

A 5th implication concerns compliance governance and implementation harmonisation. The findings of this article indicate that compliance capacity is one of the principal determinants of whether sanctions acquire real-world effect. Consequently, future policy development should not treat compliance as a downstream matter delegated entirely to private actors. It should instead be approached as a central field of governance requiring clearer guidance, better data integration, stronger feedback channels between regulators and market operators, and more consistent implementation expectations across the Union. The report's concern with evidentiary thickening without enforcement conversion is especially important here: if intelligence, red flags, and partner information accumulate without producing faster institutional action, then reform is required not only in sanctions design but also in enforcement process, data use, and coordination. The policy implication is that implementation quality must be treated as a strategic asset rather than a technical afterthought.

A 6th implication concerns proportionality safeguards and the reduction of collateral over-friction. One of the clearest lessons of the report is that durability depends on keeping friction strategically allocated rather than diffusely punitive. This means that sanctions governance must preserve credible humanitarian channels, legally protected pathways, workable derogations, and a sufficiently visible distinction between targeted pressure and avoidable disruption of lawful activity. The policy relevance of this finding is considerable. Over-compliance, supply disruption, and procedural opacity do not merely create ethical or legal concerns; they also threaten the political sustainability and operational usability of the regime. Accordingly, future policy design

should regard proportionality safeguards not as a concession, but as one of the preconditions of long-term effectiveness.

A 7th implication concerns litigation signals and corrective mechanisms. The report treats repeated judicial scrutiny, de-listing pressure, and procedural criticism as indicators of structural stress rather than as isolated inconveniences. This has an important policy consequence: the EU should institutionalise stronger review discipline, statement-of-reasons practice, correction mechanisms, and structured monitoring of recurrent litigation patterns. If courts repeatedly identify problems in evidentiary substantiation, over-broad benefit tests, or poorly framed exceptions, these should be treated as prompts for legislative recalibration rather than merely as case-specific defensive episodes. In this way, litigation becomes part of governance learning.

Taken together, these implications point towards a more mature policy paradigm for EU sanctions. The central task is no longer simply to demonstrate resolve through successive package expansion. It is to build a sanctions regime that remains clearer, faster, better coordinated, more evidence-responsive, and more proportionately governed than the adaptive systems it seeks to constrain. This is precisely what the report's medium-term outlook implies: the effectiveness of EU sanctions in 2026–2030 will depend not on their declaratory hardness alone, but on the Union's ability to maintain the institutional quality of the regime under conditions of prolonged geopolitical contestation.

This policy reading also prepares the next step. If the findings generate concrete implications for the future design and maintenance of the EU sanctions regime, they must also be brought back to the article's original analytical framework. The next subsection therefore considers how the study's results relate to the working hypothesis and to the three central variables proposed at the outset of the article.

The findings of the study provide substantial support for the working hypothesis formulated in the introductory part of the article. That hypothesis proposed that the long-term effectiveness of the EU sanctions regime against Russia would depend less on the formal accumulation of restrictive measures than on the institutional quality of the sanctions architecture, and more specifically on the interaction of legal resilience, hybrid adaptability, and compliance-based operational capacity. The Results and Discussion sections have shown that this proposition is broadly confirmed, although with several important qualifications that refine its analytical meaning.

First, the hypothesis is confirmed in its central claim that formal expansion alone is an insufficient predictor of effectiveness. The Results demonstrated repeatedly that a wider sanctions regime does not necessarily become a more effective one if complexity increases faster than intelligibility, if substitution networks stabilise more quickly than controls evolve, or if implementation burdens begin to outweigh operational gain. The report's medium-term outlook supports this conclusion very clearly by shifting the analytical focus from simple package expansion to the maintenance quality of the accumulated regime. This means that the hypothesis was correct in treating institutional quality, rather than quantitative breadth, as the more decisive explanatory factor in the mature phase of sanctions governance.

Secondly, the findings strongly confirm the role of legal resilience as one of the principal conditions of long-term effectiveness. The analysis has shown that the sanctions regime's durability depends on clarity of drafting, derogation design, judicial defensibility, update capacity, and the preservation of proportionality and protected pathways. These legal characteristics are not simply normative supplements to a strategic regime. They form part of the very mechanism through which the regime remains governable and operational over time. In this respect, the hypothesis is confirmed not merely formally, but substantively: legal resilience does indeed

function as one of the core variables explaining whether the sanctions regime remains coherent, defensible, and adaptable under prolonged pressure.

Thirdly, the hypothesis is also confirmed in relation to hybrid adaptability. The Results section showed that hybrid sanctions have become central to the mature EU regime because many significant forms of pressure now operate through cross-domain intervention against enabling infrastructures rather than through direct prohibitions alone. The report's assessment of comparative strengths is particularly important here: hybrid measures derive force from flexibility, adaptability, cross-domain reach, and the ability to close loopholes without full redesign of the sanctions regime. At the same time, the findings have refined the original hypothesis by showing that hybrid adaptability should not be understood as a general synonym for complexity. It is analytically meaningful only where cross-domain interaction is constitutive of the restrictive mechanism and where network-centred intervention remains supported by sufficient legal discipline and evidentiary quality. Thus, the hypothesis is confirmed, but in a more precise form than initially stated.

Fourthly, the findings provide equally strong support for the role of compliance-based operational capacity. The analysis has shown that compliance is not merely an implementation detail but the principal channel through which restrictive measures are translated into everyday behavioural restraint. The report repeatedly underlines that sanctions affect conduct when they are embedded in screening, due diligence, licensing, payment control, insurance scrutiny, and internal risk governance. In this sense, the hypothesis is confirmed very clearly: without sufficient compliance capacity, even formally ambitious sanctions may remain underperforming in practice. However, the findings again add an important qualification. Compliance capacity does not function simply as a positive force multiplier. It may also generate over-compliance, fragmentation, and defensive de-risking. The explanatory value of the variable therefore lies not in the existence of compliance as such, but in the quality, proportionality, and coordination of compliance architecture.

At the same time, the study's findings suggest that the original hypothesis requires one important refinement. The three variables—legal resilience, hybrid adaptability, and compliance capacity—do not operate as independent parallel determinants whose effects can be added mechanically. Rather, their explanatory strength lies in their mutual interaction. Legal resilience stabilises the normative environment within which hybrid measures and compliance systems can function without excessive fragmentation. Hybrid adaptability expands the reach of the regime into enabling infrastructures, but requires legal precision and compliance quality to remain sustainable. Compliance operationalises sanctions in practice, but depends on intelligible legal design and benefits greatly from hybrid intelligence and network mapping. The findings therefore suggest that the hypothesis should be interpreted relationally: the regime remains effective not because it possesses these variables separately, but because it preserves a sufficiently coherent balance among them.

Another refinement concerns the role of external coordination, which emerged from the Results section as a more central factor than the initial hypothesis explicitly foregrounded. Although the hypothesis referred to institutional quality, the empirical analysis showed that the regime's operational reality is deeply transnational and that partner alignment, data-sharing, and coalition geography significantly affect practical effectiveness. This does not invalidate the hypothesis, but it suggests that external coordination may be treated either as a fourth enabling condition or as a cross-cutting environment within which the three principal variables are able—or unable—to function at full force.

Accordingly, the findings support a revised formulation of the working hypothesis. The long-term effectiveness of the EU sanctions regime against the Russian Federation depends less on the quantity of restrictive measures than on the extent to which the regime maintains a coherent interaction between legal resilience, hybrid adaptability, compliance capacity, and transnational coordination under conditions of persistent adaptation and medium-term governance strain. This revised formulation preserves the core insight of the original hypothesis while making clearer that sanctions effectiveness is a relational and systemic property rather than the sum of several isolated strengths.

In overall terms, therefore, the study confirms the working hypothesis to a substantial degree. The evidence does not support a narrow reading of sanctions effectiveness based solely on formal severity or package proliferation. Instead, it supports the article's central proposition that, in a prolonged confrontation, the operational force of sanctions depends on how well the regime is legally built, adaptively extended, practically translated, and institutionally coordinated over time. This conclusion provides the bridge to the final part of the Discussion, which addresses the limits of interpretation and the directions that further research should take in order to deepen and test the analytical model proposed in the present article.

While the findings of the study support a more integrated understanding of the EU sanctions regime against the Russian Federation, they also point to several important limits of interpretation that should be acknowledged in order to preserve analytical precision. The first limit concerns the inherent difficulty of evaluating sanctions in a setting characterised by prolonged strategic interaction, overlapping policy instruments, and incomplete visibility of adaptive networks. As the Results section has shown, the mature sanctions regime operates through a combination of legal restrictions, hybrid interventions, compliance-based controls, and transnational coordination, while the targeted system simultaneously develops substitute routes, intermediary channels, and enabling infrastructures. Under such conditions, it is often difficult to isolate the marginal effect of a single regulatory measure from the wider cumulative architecture within which it functions.

A second limit concerns the evidentiary structure of sanctions analysis. The report repeatedly indicates that many of the most strategically important features of the mature sanctions environment—circumvention patterns, route substitution, proxy facilitation, ownership opacity, and hybrid enabling networks—are known through dispersed and partially indirect indicators rather than through fully transparent and uniformly public evidence. This does not make analysis impossible, but it does mean that interpretation must remain cautious, especially where conclusions concern the relative speed of adaptation, the operational significance of third-country channels, or the precise weight of individual hybrid interventions.

A third limit follows from the distributed nature of enforcement. The study has argued that compliance capacity and enforcement convergence are central to sanctions effectiveness, yet the same conclusion implies a methodological difficulty: the operational quality of the regime is not uniform across Member States, sectors, or partner jurisdictions. What appears as legal resilience or compliance strength at the level of the general framework may, in practice, be weakened by local divergence, administrative asymmetry, or sector-specific capacity constraints. For this reason, the present article should be understood as offering an analytically integrated model of the regime rather than a fully disaggregated empirical map of all national and sectoral implementation environments.

A fourth limit relates to the medium-term outlook developed in the Results section. The analysis of 2026–2030 is necessarily conditional rather than predictive in a strict sense. The article does not claim to forecast a fixed future trajectory of sanctions effectiveness. Rather, it identifies

durability conditions, erosion risks, and recalibration triggers on the basis of the institutional logic and strategic patterns already visible in the report. This distinction is important. The value of the outlook lies in clarifying the conditions under which the regime is more likely to remain effective, not in asserting that any single policy path will definitely prevail.

These interpretative limits also indicate several promising directions for further research. First, future studies should work towards the operationalisation of legal resilience as a more precise analytical category. The present article has shown that legal resilience includes clarity of drafting, derogation design, judicial defensibility, update capacity, and enforcement convergence, but further work is needed to convert these dimensions into a more explicit set of indicators that would make cross-regime comparison more systematic. Such research would be particularly valuable for comparing the EU model with other sanctions systems, including those of the United States and broader G7 coalitional frameworks.

Secondly, further research is needed on metrics of hybrid friction and adaptation cost. One of the central claims of this article is that hybrid sanctions increasingly target enabling infrastructures rather than isolated violations. Yet the study also shows that the empirical measurement of this pressure remains difficult, especially where adaptation occurs through modular and partially opaque networks. Future work could therefore focus on developing more refined indicators of route instability, service-layer disruption, network replacement speed, and the cost of substitute infrastructures. Such work would significantly strengthen the empirical basis of hybrid-sanctions theory.

Thirdly, the findings point to the need for more detailed research on comparative enforcement divergence across Member States and sectors. The current article has treated enforcement asymmetry as one of the structural limits of the regime, but further studies could investigate more precisely how differences in supervisory practice, evidentiary standards, licensing culture, institutional capacity, and private-sector compliance maturity shape the real distribution of sanctions effectiveness across the Union. This would also contribute to a better understanding of where regime coherence is strongest and where it remains most vulnerable to fragmentation.

Fourthly, future scholarship should examine more closely the relationship between compliance governance and proportionality safeguards. The study has shown that compliance is indispensable to sanctions effectiveness, yet it may also generate over-compliance, defensive de-risking, and collateral friction. A more detailed exploration of how legal safeguards, guidance quality, and supervisory expectations shape this balance would be particularly relevant for the long-term legitimacy and usability of sanctions regimes operating within rule-of-law systems such as that of the European Union.

Finally, further research would benefit from a broader comparative inquiry into institutional sustainability in prolonged sanctions environments. The present article has proposed that long-term effectiveness depends not simply on the intensity of pressure, but on the sanctioning system's capacity to preserve clarity, adaptability, operational tempo, and political legitimacy over time. This proposition deserves to be tested across other cases of long-duration sanctions in order to determine whether the explanatory model developed here—centred on legal resilience, hybrid adaptability, and compliance capacity—has wider applicability beyond the EU–Russia context.

Taken together, these considerations delimit the interpretative reach of the study while also reinforcing its broader contribution. The article does not claim to provide a final theory of sanctions effectiveness. Rather, it proposes an analytical model capable of capturing the institutional, legal, and operational complexity of a mature sanctions regime in a way that binary

or purely sectoral approaches cannot. With these limits and research directions in view, the article can now proceed to its concluding section, where the main findings are synthesised and the broader significance of the study is stated in its most concentrated form.

Conclusion

The central research question of the present article concerned how legal resilience, the hybridisation of restrictive instruments, and compliance capacity shape the long-term effectiveness of the European Union's sanctions regime against Russia. On the basis of the analysis undertaken, the study arrives at a generalised answer: the long-term effectiveness of the EU sanctions regime is determined less by the sheer quantity of restrictive measures than by the degree to which the regime functions as a coherent, adaptable, and operationally governable sanctions architecture.

More precisely, the findings demonstrate that sanctions remain effective over time when three conditions are simultaneously present. First, the regime must possess sufficient legal resilience, meaning that it remains clear, defensible, proportionate, updateable, and capable of preserving coherence under sustained political, judicial, and administrative pressure. Secondly, it must display adequate hybrid adaptability, that is, the capacity to extend restrictive pressure beyond direct prohibitions and into the enabling infrastructures, intermediary systems, and cross-domain networks through which circumvention and substitution are organised. Thirdly, it must be supported by sufficiently developed compliance capacity, through which legal norms are translated into practical behavioural constraints across financial, commercial, logistical, and service-related environments. Where these three dimensions interact in a coordinated manner, the sanctions regime is capable of sustaining cumulative pressure even in the absence of immediate policy reversal by the targeted state.

Accordingly, the study shows that the effectiveness of the EU sanctions regime should not be reduced to a binary judgement of success or failure. Instead, it should be understood as the extent to which the regime is able to maintain durable, cumulative, and institutionally mediated restrictive force across multiple domains while preserving its legal and governance viability. In this sense, the article argues that the EU sanctions regime against Russia is most accurately interpreted as a form of integrated governance under prolonged geopolitical confrontation, whose practical strength depends on institutional quality, adaptive reach, and implementation coherence rather than on formal expansion alone.

This generalised answer also clarifies the broader significance of the study. The long-term effectiveness of sanctions is not simply a matter of imposing costs on a target economy or signalling political disapproval. It is equally a matter of whether the sanctioning system itself can remain governable, coordinated, and strategically responsive over time. For that reason, the EU sanctions regime emerges from this research not merely as a set of restrictive acts, but as a dynamic and cumulative governance architecture whose durability depends on how well it is legally constructed, adaptively extended, and operationally maintained.

The central argument of this article is confirmed by the results of the analysis. The study has demonstrated that the EU sanctions regime against Russia is best understood not as a mechanically expanding set of restrictive measures, but as an integrated governance architecture whose effectiveness depends on the interaction of normative design, cross-domain adaptability, and operational implementation. In this respect, the evidence presented throughout the article supports the proposition that the long-term force of sanctions is shaped less by formal breadth alone than by the institutional quality of the regime through which that breadth is organised and maintained.

More specifically, the research confirms that legal resilience, hybrid regulatory reach, and compliance-based operationalisation constitute the three principal pillars of the regime's long-term effectiveness. Legal resilience ensures that the sanctions system remains intelligible, judicially defensible, proportionate, and capable of controlled amendment. Hybrid regulatory reach enables the regime to extend pressure beyond direct prohibitions and into the enabling infrastructures, intermediary systems, and adaptive networks that sustain circumvention and substitution. Compliance-based operationalisation ensures that restrictive norms are translated into practical behavioural constraints across banking, trade, insurance, transport, corporate governance, and service provision. Taken together, these dimensions explain why the regime is able to preserve cumulative restrictive force even in conditions where immediate coercive results remain limited or uneven.

The analysis also confirms a further aspect of the article's central argument, namely that sanctions effectiveness in the contemporary European context must be interpreted as a multidimensional and institutionally mediated phenomenon. The regime's value lies not only in direct coercion, but also in degradation of access, narrowing of adaptive space, reinforcement of coalition discipline, and preservation of a legally and politically structured order of restrictive governance. This finding is especially important because it demonstrates that the EU sanctions regime derives part of its strength from its capacity for self-maintenance: from the quality of its legal construction, the discipline of its updates, the coherence of its implementation, and the credibility of its recalibration mechanisms.

Accordingly, the article confirms that the operational durability of the EU sanctions regime cannot be adequately explained through traditional success–failure models alone. Its effectiveness rests on whether the regime can remain legally robust, adaptively responsive, and practically executable over time. In this sense, the central argument of the study is sustained in full: the enduring strategic relevance of the EU sanctions regime depends not on sanctions proliferation as such, but on the continued coherence and governability of the sanctions architecture itself.

The principal theoretical contribution of the study lies in the development of an integrated analytical model for the interpretation of contemporary sanctions regimes. Rather than treating sanctions as a simple aggregate of restrictive acts or as an episodic instrument of coercive diplomacy, the article has proposed that the EU sanctions regime against the Russian Federation should be analysed as an integrated governance architecture whose effectiveness is conditioned by the interaction of three core variables: legal resilience, hybrid adaptability, and compliance capacity. In this respect, the study contributes to sanctions scholarship by moving beyond segmented approaches in which legal analysis, strategic analysis, and implementation analysis are typically conducted in parallel but not fully synthesised.

A first theoretical contribution consists in the article's reconceptualisation of sanctions effectiveness itself. The study has argued that effectiveness should not be reduced to a binary opposition between success and failure, nor confined exclusively to immediate policy reversal by the targeted state. Instead, it should be understood as a multidimensional and institutionally mediated phenomenon encompassing coercive, degradational, deterrent, coordinative, legitimising, and governance-sustaining effects. This conceptual shift is important because it better reflects the operational reality of mature sanctions regimes, especially those that persist over several years and function through cumulative, adaptive, and legally structured mechanisms rather than through one-off coercive episodes.

A second theoretical contribution lies in the introduction and systematic use of legal resilience as an explanatory category in sanctions studies. While earlier scholarship has addressed

legal certainty, proportionality, judicial review, and implementation coherence, these issues have often been treated as isolated legal concerns rather than as integral determinants of long-term sanctions effectiveness. The study has shown that legal resilience provides a more comprehensive framework by integrating clarity of drafting, derogation design, judicial defensibility, update capacity, and enforcement convergence into a single analytical concept. In this way, the article demonstrates that law is not merely the formal container of sanctions policy, but one of the principal media through which sanctions acquire durability, governability, and cumulative force.

A 3rd theoretical contribution concerns the article's interpretation of hybridisation. The study has shown that hybrid sanctions should not be understood simply as complex or multi-sectoral measures, but as instruments whose operative mechanism is constitutively cross-domain. This distinction is theoretically significant because it clarifies that the mature sanctions regime increasingly acts not only against direct violations, but also against enabling infrastructures, intermediary systems, and adaptive networks that sustain circumvention. By framing hybridisation in this way, the article contributes to a broader understanding of sanctions as a form of cross-domain governance rather than merely as a catalogue of prohibitions directed at static economic exchange.

A 4th contribution is the repositioning of compliance within sanctions theory. The study has argued that compliance should be treated not as a peripheral implementation issue, but as the operational transmission mechanism through which restrictive norms are converted into behavioural restraint across public and private governance structures. This theoretical move is important because it helps to explain how formal legal restrictions acquire practical force in banking, logistics, insurance, corporate governance, and service provision, and why sanctions effectiveness often varies according to the quality of implementation architecture rather than the formal severity of measures alone. In this respect, the article offers a more complete causal account of how sanctions function in practice within transnational economic environments.

A 5th contribution lies in the article's emphasis on institutional sustainability as a condition of long-term sanctions effectiveness. The study has shown that, in prolonged geopolitical confrontations, sanctions must be analysed not only in relation to the target state's behaviour, but also in relation to the sanctioning system's capacity to preserve legal coherence, adaptive tempo, implementation discipline, and political legitimacy over time. This introduces a reflexive dimension into sanctions theory: the sanctions regime itself becomes an object of analytical concern, not merely the pressure it exerts externally. Such a perspective is especially important for understanding the EU case, where sanctions are embedded within a rule-of-law order and a multi-level governance structure that shape both their reach and their limits.

Taken together, these contributions position the article at the intersection of sanctions studies, European governance research, and regulatory theory. The study does not reject classical theories of economic statecraft, coercion, or deterrence; rather, it extends them by showing that, in the context of a mature and cumulative sanctions regime, effectiveness depends increasingly on the institutional architecture through which pressure is legally structured, adaptively extended, and operationally maintained. In that sense, the theoretical contribution of the article lies in offering a more adequate framework for analysing sanctions as durable systems of governance under conditions of prolonged geopolitical confrontation.

The practical relevance of the study lies in the fact that it provides a structured analytical basis for understanding how the EU sanctions regime against the Russian Federation can preserve its effectiveness under conditions of prolonged geopolitical confrontation. The article has shown that the future value of the regime depends not simply on the addition of further

restrictive measures, but on the quality of the institutional architecture through which those measures are formulated, adapted, and implemented. In practical terms, this means that the maintenance of sanctions effectiveness requires a shift from a predominantly expansion-oriented policy logic towards a more disciplined model of governance-centred sanctions management.

One important practical implication concerns the need to strengthen legal clarity and drafting discipline within the sanctions framework. The findings of the study indicate that a legally resilient regime is more likely to remain intelligible for regulators, courts, and private operators, and therefore more likely to preserve operational coherence over time. In this respect, the article suggests that improving legislative precision, simplifying recurrently ambiguous formulations, and codifying frequently repeated interpretative clarifications would contribute directly to the practical effectiveness of the regime by reducing legal uncertainty, lowering the risk of divergent implementation, and limiting excessive dependence on informal explanatory guidance.

A second area of practical relevance concerns adaptive policy maintenance. The study has demonstrated that the sanctions regime can retain strategic force only if it is able to respond to evolving patterns of circumvention, substitute infrastructures, and intermediary facilitation with sufficient speed and institutional discipline. This implies that the EU and its partners should continue to develop faster update cycles, more flexible review mechanisms, and clearer recalibration procedures. From a practical policy perspective, sanctions should therefore be treated not as static legal constructs, but as instruments requiring continuous monitoring, selective revision, and evidence-based adjustment in response to changing operational conditions.

A third implication relates to compliance governance. Since the article has shown that compliance capacity functions as the operational transmission mechanism of sanctions, the effectiveness of the regime depends heavily on the quality of guidance, supervisory communication, data integration, and institutional interaction between public authorities and private operators. In practical terms, this means that the future development of EU sanctions policy should place greater emphasis on implementation harmonisation, beneficial ownership transparency, due-diligence quality, information-sharing, and the reduction of enforcement asymmetries across Member States and sectors. A sanctions regime that is formally robust but unevenly operationalised is unlikely to sustain its full restrictive potential.

The study is also practically relevant in relation to hybrid and anti-circumvention policy. The findings indicate that modern sanctions are increasingly effective when they target enabling infrastructures rather than merely the most visible outputs of prohibited activity. This suggests that future sanctions practice should devote greater attention to network mapping, route analysis, intermediary jurisdictions, service-layer dependencies, and the institutional ecology through which circumvention becomes scalable. In practical terms, this approach would allow the Union to move beyond repetitive node-by-node restriction and towards more strategically focused intervention against the systems that sustain adaptation.

Finally, the study has practical relevance for the long-term legitimacy and sustainability of sanctions governance. By demonstrating the importance of proportionality safeguards, protected pathways, judicial defensibility, and controlled derogation design, the article shows that the durability of sanctions depends not only on their restrictive force but also on their continued compatibility with the legal and political standards of the European Union. This is of direct practical significance, because a sanctions regime that remains legally reviewable, proportionately structured, and administratively manageable is more likely to preserve both internal support and external credibility over time.

In sum, the practical value of the study lies in its demonstration that sanctions effectiveness is inseparable from governance quality. For policymakers, regulators, legal practitioners, and compliance professionals, the article offers a framework for understanding that the future strength of the EU sanctions regime will depend not simply on how many measures are adopted, but on how clearly they are drafted, how intelligently they are updated, how consistently they are implemented, and how proportionately they are maintained.

In conclusion, the study has shown that the enduring strategic significance of the EU sanctions regime against the Russian Federation lies not in the declaratory severity of restrictive measures taken in isolation, but in the capacity of the sanctions system to function as a coherent, legally resilient, adaptively extended, and operationally maintained architecture of governance. The report (*Buychik et al., 2026*) treats sanctions as an integrated architecture whose effects are produced cumulatively through the interaction of instruments, institutions, markets, and adaptive behaviour, and further emphasises that, by 2026–2030, the decisive issue is the quality of the accumulated regime rather than the mere addition of further packages.

For that reason, the long-term effectiveness of sanctions should be understood not as a question of whether pressure exists in abstract form, but of whether the sanctioning order remains able to preserve legal clarity, proportionality, implementation coherence, hybrid adaptability, and compliance-based operational density under conditions of prolonged geopolitical confrontation. Where these qualities are sustained, sanctions retain the capacity to generate meaningful cumulative constraint even in the absence of immediate strategic reversal by the targeted state. Where they erode, formal breadth may persist while real leverage declines. The broader conclusion of the article is therefore clear: in a prolonged confrontation, sanctions endure as a credible instrument of European governance only when their legal foundations, hybrid reach, and operational transmission remain more coherent and adaptive than the infrastructures of circumvention they are designed to constrain.

Conflict of Interest

The author declares that there is no conflict of interest.

References:

Arshad, O. (2025). Russian sanctions evasion. *Journal of Financial Compliance*, *8*(3), 271–284. https://doi.org/10.69554/ZCPM4254

Bapat, N. A., Heinrich, T., Kobayashi, Y., & Morgan, T. C. (2013). Determinants of sanctions effectiveness: Sensitivity analysis using new data. *International Interactions*, *39*(1), 79–98. https://doi.org/10.1080/03050629.2013.751298

Biersteker, T. J., Eckert, S. E., & Tourinho, M. (Eds.). (2016). *Targeted sanctions: The impacts and effectiveness of United Nations action*. Cambridge University Press.

Buychik, A. et al. (Comps.). (2026). *The EU Sanctions Architecture against Russia: Effectiveness, Limits, and Strategic Options for 2026–2030*. Ostrava: European Institute for Innovation Development.

Council of the European Union. (2014a). Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. *Official Journal of the European Union*, *L 78*, 6–15.

Council of the European Union. (2014b). Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine. *Official Journal of the European Union*, *L 229*, 1–11.

Council of the European Union. (2018). *Guidelines on implementation and evaluation of restrictive measures (sanctions) in the framework of the EU common foreign and security policy*. Council of the European Union.

Council of the European Union. (2022). *EU best practices for the effective implementation of restrictive measures*. Council of the European Union.

Council of the European Union. (2024). Council Regulation (EU) 2024/2642 of 8 October 2024 concerning restrictive measures in view of Russia's destabilising activities. *Official Journal of the European Union*, *L 2024/2642*, 1.

Council of the European Union. (2025a). Council Regulation (EU) 2025/395 of 24 February 2025 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine. *Official Journal of the European Union*, *L 2025/395*, 1.

Council of the European Union. (2025b). *Timeline — EU sanctions against Russia. Council of the European Union.*

Crozet, M., & Hinz, J. (2020). Friendly fire: The trade impact of the Russia sanctions and counter-sanctions. *Economic Policy*, *35*(101), 97–146. https://doi.org/10.1093/epolic/eiaa006

Devaney, J. G. (2025). *On sanctions and the enforcement of international law: A rule of law analysis. Nordic Journal of International Law*. Advance online publication. https://doi.org/10.1163/15718107-bja10103

Drezner, D. W. (1999). *The sanctions paradox: Economic statecraft and international relations*. Cambridge University Press.

European Banking Authority. (2024). *Guidelines on internal policies, procedures and controls to ensure the implementation of Union and national restrictive measures*. European Banking Authority.

European Commission. (2025). *Sanctions adopted following Russia's military aggression against Ukraine. Directorate-General for Financial Stability, Financial Services and Capital Markets Union*.

European Commission. (2026). *Oil price cap: Guidance on sanctions against Russia and Belarus with focus on Article 3n of Council Regulation (EU) No 833/2014. Directorate-General for Financial Stability, Financial Services and Capital Markets Union*.

European Parliament. (2024). European Parliament resolution of 9 November 2023 on the effectiveness of the EU sanctions on Russia (2023/2905(RSP)). *Official Journal of the European Union*, *C/2024/2838*.

European Union Institute for Security Studies. (2015). *EU sanctions in context*. Publications Office of the European Union. https://doi.org/10.2815/54101

Hufbauer, G. C., Schott, J. J., Elliott, K. A., & Oegg, B. (2009). *Economic sanctions reconsidered* (3rd ed.). Peterson Institute for International Economics.

Jánošová, V. (2024). EU sanctions against Russia — The impact on the Russian and EU markets. *Slovak Yearbook of European Union Law*, *3*, 35–50. https://doi.org/10.54869/syeul.2023.3.796

Lonardo, L. (2023). Challenging EU sanctions against Russia: The role of the Court, judicial protection, and common foreign and security policy. *Cambridge Yearbook of European Legal Studies*, *25*, 40–63. https://doi.org/10.1017/cel.2023.11

Matuška, P. (2024). Constitutional implications of EU sanctions against the EU citizens. *European Studies*, *10*(2), 33–49. https://doi.org/10.2478/eustu-2023-0011

McNaughton, K. J. (2025). The Dutch perspective on the enforcement of the EU sanctions against Russia: Legal challenges, case law, and institutional practice. *Eastern European Journal of Transnational Relations*, *9*(3), 45–66. https://doi.org/10.15290/eejtr.2025.09.03.05

Pacholczak, A. (2024). Critical analysis of the effectiveness of EU financial sanctions against the Russian Federation. *Internal Security Review*, *30*(16), 353–383. https://doi.org/10.4467/20801335PBW.24.015.19617

Pape, R. A. (1997). Why economic sanctions do not work. *International Security*, *22*(2), 90–136. https://doi.org/10.1162/isec.22.2.90

Portela, C. (2010). *European Union sanctions and foreign policy: When and why do they work?* Routledge.

Stockbruegger, J. (2023). Reducing Russia's oil revenues: Does the allied price cap work? *The RUSI Journal*, *168*(5), 34–42. https://doi.org/10.1080/03071847.2023.2276303

van Essen, F. (2025). Caught in the middle: Overcompliance and non-compliance with EU sanctions. *Eastern European Journal of Transnational Relations*, *9*(3), 67–78. https://doi.org/10.15290/eejtr.2025.09.03.06

Voynikov, V. V. (2022). EU anti-Russian sanctions (restrictive measures): Compliance with international law. *Herald of the Russian Academy of Sciences*, *92*(Suppl. 7), S636–S642. https://doi.org/10.1134/S1019331622130111