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The EU Sanctions Architecture against Russia

Effectiveness, Limits, and Strategic Options for 2026–2030

A comprehensive assessment of the political, economic, social, legal, hybrid, and compliance dimensions of the EU sanctions regime

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The EU Sanctions Architecture against Russia: Effectiveness, Limits, and Strategic Options for 2026–2030

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Content

PART TWO

Sanctions in the Political Sphere and Their Effectiveness

2.1. General Characteristics of Political Sanctions

2.1.1. The Concept of Political Sanctions

Political sanctions in international practice constitute a category of restrictive measures whose primary purpose is linked not so much to the infliction of direct economic damage as to changing the political status, foreign-policy legitimacy, diplomatic room for manoeuvre, and international subjecthood of the addressee. Unlike economic and financial sanctions, political sanctions operate primarily in the sphere of inter-state recognition, institutional participation, diplomatic communication, and the symbolic-normative position of a state, or of officials associated with it, within the international system. Their effect, however, should not be treated as merely "symbolic": under contemporary conditions, political sanctions often create real constraints on the international manoeuvrability, negotiating position, channels of influence, and coalition-building capacity of the target state. For professional analysis, it is important that political sanctions may exist both in a standalone form and in conjunction with economic, legal, and personal measures, strengthening the latter through delegitimation of the addressee's conduct and increasing the international coherence of the pressure regime. In the context of the sanctions policy of the EU and its partners against the Russian Federation, this is particularly evident, since political measures accompanied and structured the subsequent escalation of sectoral and other restrictions. Consequently, the concept of political sanctions should be defined not by the criterion of an "absence of economic content", but by the dominant mechanism of impact—namely, political-diplomatic narrowing of opportunities, international delegitimation, and institutional restriction of participation. Such an approach helps to avoid the methodological error of underestimating political sanctions as a secondary or purely declaratory component of the wider regime. On the contrary, in contemporary sanctions architecture they frequently perform the function of the initial framework that shapes the normative and coalition structure of subsequent pressure.

In substantive terms, political sanctions encompass a broad range of measures aimed at altering the diplomatic and international-institutional position of the addressee. These may include suspension or restriction of high-level political contacts, freezing of bilateral and multilateral cooperation formats, limitation of participation in international forums and institutions, refusal to hold joint events, downgrading of diplomatic engagement, as well as publicly articulated regimes of political isolation, delegitimation, and condemnation. In some cases, political sanctions in a broader analytical sense also include decisions to suspend negotiation processes under particular agreements, terminate institutional dialogues, exclude the addressee from consultative or representative mechanisms, and restrict access to platforms of political influence. At the same time, not all such measures are always formalised in the same legal format: some may be fixed in official legal acts, others in decisions of inter-state bodies, and others still in coordinated diplomatic practice within a coalition. For the purposes of the present document, this is of fundamental importance, because political sanctions against the Russian Federation are implemented precisely as a multilayered combination of legal, institutional, and diplomatic decisions. In analytical terms, this means that the assessment of political sanctions should not be limited to a list of formally adopted documents; it is also necessary to take account of the actual restructuring of international political interaction with the addressee. Consequently, the concept of political sanctions in this section is used in a functional sense: as a set of measures aimed at reducing the diplomatic, institutional, and reputational-political capacity of the target state's foreign-policy

conduct. It is this understanding that provides a sound basis for the subsequent analysis of specific political sanctions and the assessment of their effectiveness.

A key characteristic of political sanctions is their impact on the legitimation and reproduction of the addressee's international position. Whereas economic sanctions primarily affect resources, markets, and transactional capabilities, political sanctions affect a state's ability to sustain the status of a "normal" participant in the international order in the eyes of other states, international organisations, diplomatic corps, and global public audiences. This effect is manifested through institutional marginalisation, reduced density of political contacts, restricted access to channels of formal and informal influence, and the establishment of a durable normative framework in which the addressee's conduct is classified as unacceptable. In the sanctions' regime against the Russian Federation, this function is of particular significance, because political sanctions not only express condemnation, but also shape a long-term international environment in which further interaction with Russian state institutions becomes more risky, more costly, and more politically sensitive for external partners. In this regard, political sanctions should be treated as an instrument for changing not only the behaviour of the addressee, but also the behaviour of third actors in relation to it. In analytical terms, this is especially important because the effectiveness of political sanctions often manifests itself not in a direct responsive change in the target state's policy, but in the restructuring of international coalition discipline, diplomatic distance, and institutional barriers to its foreign-policy activity. Consequently, the concept of political sanctions must include their dual effect: impact on the addressee and simultaneous structuring of the external environment around it. Such an approach makes it possible to assess their place in the overall sanctions architecture more precisely and to avoid the simplified view of political measures as merely the "rhetorical accompaniment" to economic restrictions.

Particular attention should be paid to distinguishing political sanctions from adjacent categories—diplomatic response measures, foreign-policy statements, legal qualifications, and personal restrictions. In practical policy, these elements are often applied simultaneously and perceived as a single block of pressure; however, for analytical work they must be differentiated according to their mechanism of action and expected outcome. Not every political condemnation constitutes a sanction in the strict sense if it is not accompanied by an institutionally meaningful restriction of access, participation, or interaction. Likewise, not every personal measure automatically belongs to political sanctions if its primary mechanism of impact is financial, migration-related, or compliance-legal in nature. At the same time, a number of personal restrictions imposed on senior officials, official representatives, and politically significant figures may perform a pronounced political-sanctions function, since they directly affect diplomatic representation, international communication, and the symbolic status of the addressee. For the present document, this distinction is of fundamental importance, because further on it will be necessary to classify measures according to the dominant type of impact while preserving an understanding of their inter-category overlaps. Consequently, the concept of political sanctions in this section is defined not formally by the title of the measure, but analytically—by the predominant channel of its foreign-policy and institutional effect. Such methodological precision is especially necessary for a critical assessment of effectiveness, since it makes it possible not to conflate the effect of delegitimation, the effect of isolation, the effect of economic restriction, and the effect of enforcement pressure. In this way, a more precise basis is created for the subsequent examination of political sanctions of the EU and its partners against the Russian Federation.

From the standpoint of the logic of foreign-policy coercion, political sanctions perform several interrelated functions. First, they fix the international-political qualification of the addressee's conduct and establish the normative framework within which subsequent restrictive measures acquire additional legitimacy and coalition support. Secondly, they reduce diplomatic room for manoeuvre, making it more difficult to use established channels of influence, reputational compensation, and institutional presence. Thirdly, they strengthen the signalling function of the sanctions regime as a whole by providing third countries, international organisations, and private actors with a clearer understanding of the political seriousness and expected duration of the pressure regime. Fourthly, they may play a

preventive role by increasing the political cost of further escalation or refusal of negotiated and legal solutions. For the analysis of sanctions against the Russian Federation, these functions are especially significant, because political sanctions serve as one of the key mechanisms for maintaining coalition durability and the international interpretative framework of events. In analytical terms, this means that the effectiveness of political sanctions should be assessed not only by the criterion of whether the addressee's behaviour changed, but also by the criteria of international consolidation, durability of the isolation regime, reproducibility of the political signal, and the capacity to prevent diplomatic normalisation in the absence of changes in baseline conditions. Consequently, the concept of political sanctions must be embedded from the outset in a multidimensional assessment model, rather than in a narrow criterion of immediate coercion. This is particularly important for the subsequent structure of the section, where it will be necessary critically to compare the stated objectives of political measures with their actual effects and implementation constraints.

Finally, within the applied framework of the present document, political sanctions should be understood as institutionally and diplomatically formalised restrictive measures aimed at delegitimising the conduct of the target state, narrowing its international political space, and strengthening the coalition pressure regime. Such a working definition makes it possible to preserve both terminological precision and analytical flexibility: it covers both formal restrictions on participation and contacts, and more complex regimes of political-institutional exclusion, provided they have a durable restrictive effect. In relation to the Russian Federation, this is especially important because the political sanctions of 2022–2025 do not operate in isolation, but as part of a cumulative architecture in which political isolation, legal qualification, economic pressure, and compliance-mediated mechanisms reinforce one another. Consequently, the further analysis in Part 2 will proceed on the basis of an understanding of political sanctions as an autonomous category with its logic of effectiveness, but in constant connection with other types of sanctions pressure. Such an approach provides the methodological basis for the subsequent review of specific political sanctions, their advantages, limitations, implementation problems, and prospects of effectiveness in 2026–2030.

2.1.2. Reasons for the Introduction of Sanctions against Russia

The reasons for the introduction of sanctions against the Russian Federation in contemporary international practice are complex in nature and cannot be reduced to a single political reaction to an isolated episode. For professional analysis, it is essential to proceed on the basis that the sanctions regime against Russia was formed as a response to a set of actions interpreted by European institutions and partners as a systemic violation of fundamental principles of international law, European security, and norms of inter-state conduct. In this sense, the reasons for introducing sanctions include not only an event-based trigger, but also a broader context—namely, the accumulation of conflict between the foreign-policy course of the Russian Federation and the normative-legal foundations of the European order. This approach is particularly important for the analysis of political sanctions, because it is political sanctions that, as a rule, first fix the international-political qualification of what is occurring and establish the framework for the subsequent expansion of restrictive measures. Consequently, a sound description of the reasons for introducing sanctions against Russia must take into account both immediate grounds (specific actions and decisions) and structural grounds (the perception of a threat to international security, the undermining of state sovereignty, and the destabilisation of the regional order). This makes it possible to avoid a simplified scheme in which sanctions are treated merely as an emotional-political response, and to move towards a more precise understanding of them as an institutionalised form of foreign-policy reaction. In analytical terms, such an approach creates the basis for subsequent assessment of the proportionality, logic, and effectiveness of political sanctions. At the same time, it makes it possible to distinguish officially declared reasons for the introduction of sanctions from accompanying political motives, which may affect the pace, design, and depth of the sanctions regime but do not exhaust its normative foundation.

The first group of reasons is connected with the military-political actions of the Russian Federation against Ukraine, which in European and broader coalition interpretation are regarded as a grave violation of international law, and of the sovereignty and territorial integrity of Ukraine. It was this factor that became the central basis for the sharp expansion of the sanctions regime of the EU and its partners in 2022 and gave sanctions policy a qualitatively different scale compared with earlier phases of restrictive measures. For the purposes of the present document, it is important to emphasise that in the political-sanctions logic the issue is not merely a reaction to the fact of armed conflict as such, but a reaction to the type of action involved—the use of force and the conduct of war in violation of norms which European institutions regard as fundamental to the post-war order and the security architecture in Europe. In this respect, political sanctions perform the function of a primary normative response: they record the international-political assessment of what is occurring, restrict the normalisation of diplomatic relations, and prepare the legitimating basis for subsequent economic, financial, technological, and legal measures. Consequently, the military-political factor is not simply “one of the reasons”, but the system-forming foundation of the sanctions regime against the Russian Federation in 2022–2025. At the same time, for analytical accuracy it is necessary to recognise that this factor operates in combination with other sanctions grounds rather than in complete isolation from them. It is precisely this multilayered set of reasons that helps to explain why the sanctions regime acquired a cumulative and multi-regime character. In what follows, this has fundamental importance for the assessment of political effectiveness: sanctions respond not only to specific military actions, but also to the broader problem of changes in rules of conduct within the European security system.

The second group of reasons concerns the undermining of international security and stability in the European region in a broader sense, including the creation of long-term risks of escalation, destabilisation of neighbouring states, and erosion of the predictability of foreign-policy interaction. For the EU and its partners, sanctions against the Russian Federation in this respect function not only as a retrospective punitive measure for actions already taken, but also as an instrument for limiting further destabilising capabilities. In the logic of political sanctions, this means that their introduction is motivated not only by an assessment of past events, but also by the need to create a foreign-policy barrier against expansion of the crisis, the spread of coercive practices, and the normalisation of force-based revision of international borders. This causal framework is especially significant for political sanctions because they are the fastest means of demonstrating a coalition position, marking the boundaries of acceptable conduct, and fixing institutional distance vis-à-vis the target state. Consequently, in this case sanctions are introduced not only as a means of response, but also as an instrument of preventive stabilisation of the international environment. For subsequent critical analysis, this is important because it makes it possible to assess political sanctions not solely by the criterion of coercing an immediate change in behaviour, but also by the criterion of deterring further escalation and strengthening the coalition security architecture. Such an approach is consistent with the logic of European policy analysis, in which the reasons for introducing restrictive measures are considered together with the task of managing risks to the international order. In this way, political sanctions against the Russian Federation acquire an additional justification as an element of a broader strategy to protect European security and the normative resilience of international relations.

The third group of reasons is connected with the need for politico-legal delegitimation of certain actions and practices, in which sanctions perform the function of publicly formalising the international assessment of the unacceptability of the target state’s conduct. In this aspect, sanctions against Russia are introduced not only to create direct restrictions, but also to formalise the normative position of a coalition of states and international institutions. This is especially characteristic of political sanctions, since they operate directly in the field of international recognition, status, and diplomatic representation. In such circumstances, failure to provide a political response could be interpreted as a de facto downgrading of the significance of violated norms and as a signal of the permissibility of subsequent repetition of similar actions. Consequently, one of the reasons for introducing political sanctions against the Russian Federation is the maintenance of the normative force of international rules themselves through an institutionally formalised response to their violation. In analytical terms,

this matters because this reason is not always directly linked to an expectation of rapid behavioural effect on the part of the addressee; its result is also measured in terms of international consolidation, legal and political clarity, and the reproducibility of coalition positioning. For subsequent analysis of effectiveness, this means that part of the political sanctions should be assessed in categories of normative signalling and delegitimation, rather than only in categories of direct coercion. Such an approach avoids the methodological error of evaluating all sanctions through a single criterion of short-term change in Russian policy. In this way, the reasons for introducing political sanctions are revealed not only as a reaction to actions, but also as a mechanism for sustaining the normative structure of the international order.

The fourth group of reasons relates to the protection of the institutional integrity and political coherence of the European Union itself and of the coalition of partners. In EU practice, sanctions policy against the Russian Federation is not only an instrument of external pressure, but also a mechanism of internal coordination of common foreign and security policy. In this context, the introduction of political sanctions performs a consolidating function: it enables Member States and EU institutions to formalise a common position, establish a shared language of political assessment, and create the basis for subsequent agreement on more costly and complex measures—economic, financial, technological, and legal. In other words, part of the reasons for introducing sanctions against Russia lies not only in the sphere of influencing the addressee, but also in maintaining the operational capacity of the sanctions' coalition as a political actor. For analysis, this is of fundamental importance because it helps to explain why political sanctions are often adopted more quickly and form the "framing" level of pressure before the introduction of more deeply elaborated sectoral restrictions. Consequently, political sanctions should also be understood as an instrument for initiating and maintaining the sanctions architecture as a whole. In what follows, this will make it possible to assess their effectiveness more accurately in two directions: external (impact on the Russian Federation) and internal (maintenance of coalition durability and normative coherence of the EU and partners). Such a dual perspective is especially important for critical analysis, because it avoids simplified conclusions about the "ineffectiveness" of political sanctions based solely on the limited nature of their direct impact on the addressee's behaviour. In this way, the reasons for introducing political sanctions include a component of strategic organisation of the pressure regime itself.

The fifth group of reasons is connected with the need to prepare and legitimise subsequent expansion of the sanctions' regime in other spheres—economic, financial, technological, legal, and compliance-oriented. In contemporary practice, sanctions are rarely introduced in their full extent at a single moment; more commonly, a sequential trajectory of escalation is formed in which political measures play the role of the initial level of institutional and normative codification of the conflict. This is particularly characteristic of sanctions against the Russian Federation: political sanctions and political-diplomatic restrictions not only express the position of the EU and its partners, but also create the basis for the subsequent transition to more costly and technically complex restrictive regimes. From this perspective, one of the reasons for their introduction is the formation of a manageable process of sanctions escalation in which the coalition can increase pressure step by step while preserving political legitimacy and procedural coherence. In analytical terms, this makes it possible to treat political sanctions as a "linking" element between the initial response and the long-term sanctions strategy. Consequently, the reasons for their introduction should be assessed not only by reference to the content of a particular event, but also by reference to their place within the overall architecture of sanctions policy design. For subsequent critical analysis, this is important because it makes it possible to understand in which cases political sanctions were a standalone measure and in which they were part of a phased construction designed for subsequent densification of the regime. Such an approach increases the precision of effectiveness assessment because it links reasons for introduction with the actual function of the measure within the sanctions sequence. In this way, political sanctions against the Russian Federation are revealed as an instrument not only of reaction, but also of structuring the subsequent coercive regime.

The sixth group of reasons concerns response to a broader spectrum of actions associated by European institutions with the undermining of democratic institutions, human rights, the rule of law, and the security environment in Europe, including hybrid practices and destabilising activity. For the purposes of the present document, it is important to note that the sanctions regime against the Russian Federation in 2022–2025 developed not exclusively within a single "war" track: in parallel, other sanctions grounds linked to human-rights, institutional, and hybrid issues remained in force and continued to develop. This means that the reasons for introducing sanctions against Russia in the political sphere are multi-channel in character: some measures are directly linked to the war against Ukraine, while others are linked to a broader assessment of the conduct of the state and associated actors in relation to human rights, democratic processes, and the security of European states. For analysis, this circumstance is especially significant because it requires precise classification of political sanctions by ground of introduction and by dominant function. Consequently, when assessing the effectiveness of political sanctions, one must not mechanically transfer criteria from one sanctions' ground to another. Measures introduced in connection with military aggression may have one set of objectives and indicators; measures related to human rights or hybrid activity may have another. Such an approach ensures methodological clarity in the subsequent analysis and reduces the risk of conflating different types of political-sanctions impact. In this way, the reasons for introducing sanctions against the Russian Federation must be treated as a composite system of grounds united by a common logic of pressure, but differing in immediate trigger and expected mechanism of effect.

Finally, within the applied framework of the present document, the reasons for introducing sanctions against Russia are best described as a combination of normative, security-related, coalition-political, and institutional-strategic grounds. Such a definition makes it possible to account simultaneously for officially declared motives (response to violations of international law, threats to European security, and unacceptable forms of state conduct) and for the functional logic of the sanctions' regime (delegitimation, coalition consolidation, preparation of escalation, and restriction of the addressee's international manoeuvrability). In relation to political sanctions, this is especially important because both their effectiveness and the rationality of their introduction are often best understood in the aggregate of these reasons, rather than within a single narrow explanation. Consequently, the further analysis in Part 2 will proceed on the basis that political sanctions against the Russian Federation were introduced as an instrument of multilayered foreign-policy response and risk management, rather than solely as an isolated measure of pressure. This provides the necessary basis for the subsequent review of specific political sanctions, their advantages, limitations, implementation problems, and prospects of effectiveness in 2026–2030.

2.1.3. Historical Analogues

Recourse to historical analogues of political sanctions is necessary not in order to transfer conclusions mechanically to the case of the Russian Federation, but in order to develop a sound comparative analytical framework. In professional policy analysis, historical comparisons perform two functions: first, they make it possible to identify recurring mechanisms of sanctions pressure (delegitimation, diplomatic isolation, coalition signalling, and institutional restriction of participation); secondly, they help to define the limits of applicability of analogies so as to avoid erroneous conclusions of the type "it worked / did not work last time. Therefore, it will be the same now". This is especially important for the present document, because the sanctions regime against the Russian Federation combines the scale of a major power, a prolonged high-intensity war, deep integration into the world economy (in a number of sectors), and a multilayered sanctions architecture of the EU and its partners. Historical analogues should therefore be used as instruments of typological comparison rather than as direct predictive models. In this logic, the cases of South Africa, Iran, Yugoslavia, and Belarus are valuable primarily as different configurations of political sanctions: against an apartheid regime; against a state in prolonged sanctions confrontation with complex diplomacy; against a state / state formation in the context of war and UN Security Council decisions; and against a neighbouring authoritarian regime in the European

space with a high degree of dependence on an external patron. Consequently, the purpose of this subsection is not to identify an "ideal analogue" for Russia, but to extract comparative lessons regarding the types of political sanctions and their effectiveness.

2.1.3.1 The South African Case

The case of sanctions against South Africa during the apartheid period is one of the most frequently cited historical analogues in public debate; however, analytically it requires careful use. Its principal value for the present section lies in demonstrating how political sanctions and international delegitimation can gradually alter a state's international status and narrow the space for diplomatic normalisation of a regime, even where there is no direct and rapid coercive effect. In the European context, it is important that the institutions of the European Community / EU themselves, in retrospective materials, recognise the long-term policy of sanctions pressure against apartheid in South Africa. This allows the case to be used as an example of how political sanctions may perform a long-term function of normatively fixing the unacceptability of a particular type of state order and practice.

At the same time, comparability with the Russian Federation is limited in several respects. First, in South Africa the central object of international delegitimation was the internal politico-legal regime of apartheid as an institutionalised system of racial discrimination, whereas in the Russian case in 2022–2025 the system-forming basis for sanctions escalation is the war against Ukraine and the violation of international security in Europe. Secondly, the international pressure structure against South Africa developed in a different era of globalisation, before the contemporary degree of digital financial interdependence and compliance infrastructure. Thirdly, political sanctions against South Africa are often interpreted retrospectively as part of a broader historical dynamic involving internal protest, international campaigning, economic pressure, and transformation of elite calculations, rather than as a self-sufficient cause of political change. Consequently, the principal lesson of the South African case for the present analysis is not the proposition that "sanctions alone changed the regime", but the understanding that political sanctions may be effective as part of a long-term strategy of delegitimation and international isolation where broad coalition durability and cumulative effects are present.

2.1.3.2 The Iranian Case

The Iranian case is useful above all for analysing prolonged sanctions regimes in which political sanctions coexist with economic, financial, technological, and legal restrictions and periodically intersect with diplomatic openings and negotiations. Official Council of the EU materials on Iran reflect precisely a long-term, multilayered, and changing-over-time architecture of restrictive measures, including separate tracks (nuclear, human rights, drones / missiles, etc.). For the document, this is especially important because the Iranian case shows that political sanctions and political pressure may be maintained over an extended period without automatically leading either to complete political capitulation by the addressee or to complete neutralisation of the sanctions' regime.

The comparative value of this case lies in three observations. First, political sanctions often operate within a "pressure + negotiating framework" logic, where the function of sanctions is not only punitive but also to alter the conditions of negotiation, increase the cost of refusing agreements, and structure the international coalition. Secondly, even under high sanctions pressure, the addressee may develop adaptation mechanisms, alternative channels, and a strategy of delay, which requires the sanctions coalition to recalibrate the regime continuously. Thirdly, in prolonged sanctions regimes, the institutional durability of the coalition and its capacity to preserve the legal and political legitimacy of sanctions over many years are critically important. At the same time, comparability with the Russian Federation is limited by the fact that the Iranian case historically centred to a significant extent on nuclear non-proliferation and related international legal tracks, whereas the Russian case in 2022–2025 has a different centre of gravity—war, European security, the war economy of a major power, and direct impact on the security architecture of the continent. Consequently, the Iranian case is most useful here as an analogue of duration, adaptation, and cycles of "escalation—recalibration—negotiation", rather than as a direct outcome scenario for the Russian Federation.

2.1.3.3 The Yugoslav Case

The Yugoslav case (especially sanctions against the Federal Republic of Yugoslavia / Serbia and Montenegro in the 1990s) has particular value for analysing political sanctions in the context of war in Europe and international responses to armed conflict. Unlike many other cases, what matters here is not only the European level, but also the universal (UN) level of sanctions pressure. UN Security Council Resolution No 757 (1992) included not only economic restrictions but also measures with a pronounced political-diplomatic and social-political character: reduction of diplomatic and consular presence, restrictions on participation in sporting events, and suspension of scientific, technical, and cultural exchanges. For the present document, this is an important historical reference point, showing that political sanctions in a European conflict setting may form part of a broad regime of international isolation affecting not only official diplomacy, but also a state's representation in the international public sphere.

At the same time, comparability with the Russian Federation is substantially limited by scale, geopolitical status, and the structure of dependence on the external economy. The sanctions regime against Yugoslavia unfolded in a different configuration of the international system, with a greater role for the UN Security Council as the formal source of universal legitimacy for sanctions, and with a different structure of global supply chains and financial flows. In addition, the Yugoslav case is often characterised by a higher intensity of direct international isolation along certain lines of representation than is feasible in relation to a nuclear power and permanent member of the UN Security Council. Consequently, the principal lesson of this case for analysing the Russian Federation lies not in the degree of comparability of scale, but in understanding the mechanism: in wartime, political sanctions may rapidly establish a regime of international delegitimation and institutional distance that reinforces subsequent economic and other measures. The Yugoslav case is also useful as a reminder that the assessment of the effectiveness of political sanctions must consider not only the behaviour of the addressee, but also the functions of coalition consolidation, international signalling, and restriction of normalisation.

2.1.3.4 The Belarusian Case

The Belarusian case is likely the most relevant in institutional terms for the EU, since it reflects contemporary European practice of political sanctions towards a neighbouring authoritarian regime within the framework of the Common Foreign and Security Policy, including a combination of grounds (repression, human rights, undermining of democratic processes, and support for Russian aggression against Ukraine). Official Council of the EU materials directly indicate the multilayered nature of sanctions against Belarus, including earlier measures (e.g., in connection with disappearances of opposition figures and a journalist), subsequent measures related to elections, repression, and human rights, and sanctions linked to Belarus's involvement in Russian aggression against Ukraine. This makes the Belarusian case particularly useful for the present section as an example of how EU political sanctions may develop over time, layer by layer, and in combination with other categories of measures.

However, the limits of analogy are especially important here. Belarus differs substantially from the Russian Federation in the scale of its economy, international weight, military potential, degree of autonomy in foreign policy, and capacity to redistribute sanctions-related costs. In addition, in the Belarusian case a significant part of EU political sanctions simultaneously performs a signalling and normative-positioning function, while their direct coercive effect on the regime's domestic political trajectory has remained limited. This, however, does not mean that they are "useless": they play an important role in delegitimising repressive practices, maintaining international visibility of the issue, restricting political normalisation, and preserving coalition coherence. Consequently, the principal comparative lesson of the Belarusian case for the analysis of sanctions against the Russian Federation is that political sanctions may be a durable instrument of long-term pressure and delegitimation even where their immediate effect on changing regime behaviour is limited. For the Russian case, this lesson

is especially important in distinguishing the functions of political sanctions and avoiding reduction of their assessment solely to the criterion of rapid coercion.

2.1.3.5 Comparative Conclusion

Comparison with South Africa, Iran, Yugoslavia, and Belarus makes it possible to identify several methodologically important conclusions for the subsequent analysis of political sanctions against the Russian Federation.

First, political sanctions are almost never a self-sufficient instrument for rapid policy change in a major or resilient regime; their effectiveness more often manifests itself as part of a cumulative architecture of pressure (South Africa, Iran, Belarus) or as a component of broad international isolation under wartime conditions (Yugoslavia).

Secondly, political sanctions are especially important for delegitimation, coalition consolidation, and institutional structuring of subsequent measures—and it is precisely against these criteria that they often prove more effective than appears from a narrow perspective focused on “immediate coercion”.

Thirdly, the greater the addressee’s capacity for adaptation and the greater its geopolitical weight, the more important are not one-off sanctions acts, but the long-term durability of the regime, its recalibration, and the maintenance of international coordination (particularly relevant by analogy with Iran).

Fourthly, comparison with Belarus shows that, for the EU, political sanctions are not only an external instrument of pressure, but also an internal instrument of normative and institutional self-organisation of the sanctions’ coalition.

It is in this comparative-typological format that they will be used further in assessing the effectiveness of political sanctions against the Russian Federation in 2022–2025 and in forecasting the prospects of their operation in 2026–2030.

2.2. Review of Political Sanctions

2.2.1. Individual Restrictive Measures

2.2.1.1 Legal Instruments and Dates

The legal foundation of EU individual restrictive measures (listings) against the Russian Federation in the present block is built around two core acts adopted in 2014, which remain central to the 2022–2025 packages as well: Council Decision 2014/145/CFSP (17 March 2014) and Council Regulation (EU) No 269/2014 (17 March 2014), both concerning measures in respect of actions undermining or threatening the territorial integrity, sovereignty, and independence of Ukraine. This is confirmed both via EUR-Lex (as regards the titles and dates of the basic acts) and through current European Commission explanatory materials, where Regulation 269/2014 is identified as one of the key consolidated acts of the regime.

From the standpoint of legal construction, it is precisely this linked contour (CFSP Decision + directly applicable EU Regulation) that ensures the legal functioning of listings: in the political-legal dimension, CFSP decisions establish the sanctions framework, while the regulation (primarily 269/2014) ensures the binding nature of the asset-freeze regime and the prohibition on making funds/economic resources available within EU jurisdiction. The European Commission explicitly states that the relevant regulations are addressed to all persons and entities under EU jurisdiction and create legal obligations for them; at the same time, the Council of the EU, in its explanatory materials, sets out the standard content of individual measures: travel ban + asset freeze for natural persons and asset freeze for entities.

For the purposes of this subsection, it is important to note that, in the package logic of 2022–2025, individual listings are usually not formalised by a single "standalone" act, but by a combination of acts, primarily:

- Council Implementing Regulation (EU) (implementing / giving effect to Regulation 269/2014),
- Council Implementing Decision (CFSP) (implementing / giving effect to Decision 2014/145/CFSP),
- in a number of packages, also acts expanding the criteria for inclusion in the lists or refining the regime.

In other words, when analysing listings, it is necessary to take into account not only the package press release, but also the specific implementing acts published in the Official Journal (OJ), by which the annexes containing the lists of persons and entities are updated. This methodological clarification is critical for correct attribution of when exactly and by which act a particular listing was introduced.

In the chronology of 2022, package escalation in individual measures begins with the 1st package (23 February 2022), in which the Council of the EU expressly imposed targeted sanctions on 351 members of the State Duma of the Russian Federation and a further 27 individuals. The 2nd package (25 February 2022) then included the decision to freeze assets of Vladimir Putin and Sergey Lavrov, as well as additional individual measures against members of the Security Council of the Russian Federation and other State Duma members who supported recognition of the so-called "DPR/LPR". Subsequently, the 4th package (15 March 2022) added a further 15 individuals and 9 entities, the 6th package (3 June 2022) added 65 individuals and 18 entities, and the 8th package (6 October 2022) added a further 30 individuals and 7 entities; during 2022, individual measures also accompanied other packages, including package decisions of a mixed character (economic + individual).

In 2023, the package line of individual listings continued and became institutionally more complex through the strengthening of anti-circumvention and informational-political components. According to the Council of the EU timeline, the 10th package (2023) included a new round of restrictive measures, the 11th package (23 June 2023) was expressly accompanied by additional sanctions against 71 individuals and 33 entities, and the 12th package (18 December 2023) included both economic and individual measures, with a separate indication of the listing of a further 61 individuals and 86 entities. For analytical work, this is important because it shows that individual listings ceased to be merely an "appendix" to sectoral measures and became an autonomous channel of targeted pressure, regularly scaled up from package to package.

In 2024, the trend towards institutionalisation of listings continued. In particular, the 15th package (16 December 2024), according to the Council of the EU timeline, included a further set of measures, including individual restrictions as part of the overall package. In addition, in 2024 the Council of the EU continued separate point-specific listing actions (for example, in relation to actors linked to particular sectors / financing channels and disinformation), which demonstrates an important feature of the regime: individual sanctions are introduced not only on a "package" basis, but also between packages, where the coalition considers this politically and legally appropriate. This means that, for precise reconstruction of the normative trajectory of section 2.2.1, it is necessary to take into account both numbered packages and standalone listing decisions / implementing acts adopted between them.

In 2025, individual listings remained highly intensive. The Council of the EU timeline records that the 16th package (24 February 2025) was accompanied by a separate communication on the listing of an additional 48 individuals and 35 entities; the 17th package (20 May 2025) included individual measures within a broader set of sanctions regimes; the 18th package (18 July 2025) was likewise characterised by the Council as a package of "economic and individual measures"; and the 19th package (23 October 2025), according to the Council press release, included a new round of individual listings alongside expanded economic restrictions and additional measures affecting, inter alia, diplomatic presence and other channels of influence. This confirms that, by the end of 2025, individual measures remained one of the cores and continuously reproduced instruments of the EU sanctions architecture against the Russian Federation.

From a methodological perspective, in this analytical document it is advisable to distinguish three levels of normative fixation for the listings block:

1) the basic regime (Decision 2014/145/CFSP + Regulation 269/2014);
2) the package political-legal level (Council press releases / package decisions, where the political framework and overall composition of measures are set out);
3) the operational implementation level (implementing regulations / decisions in the OJ, by which the annexes containing the lists of persons and entities are directly updated).

It is precisely this three-level scheme that makes it possible to avoid the common error of conflating the date of the political announcement of a package with the date of legal entry into force of a specific listing under the relevant implementing act.

For the subsequent 2.2.1.2–2.2.1.6, this has practical significance: analysis of the objectives, advantages, and limitations of individual measures should be based not only on the general title of the "package", but also on the legal nature of the specific listing action (criteria-based designation, additional listings, amendments to annexes, annual reviews / renewals where applicable). Accordingly, in the working evidence table for this section, it is recommended to record at least the following fields: date, package number (where applicable), type of act (Decision / Implementing Decision / Regulation / Implementing Regulation), full title of the act, OJ reference, category of listed person/entity, and stated ground for listing. Such a structure will ensure a correct link between the normative part of the section and the subsequent critical analysis of the effectiveness of individual sanctions.

2.2.1.2 Objectives and Political Logic

The objectives of individual restrictive measures (listings) against the Russian Federation in the sanctions practice of the EU and its partners are multilayered and cannot be reduced to the simple formula of "punishing specific persons". From an analytical perspective, listings constitute an instrument of targeted political-legal pressure that simultaneously performs the functions of personalising responsibility, delegitimising actors supporting the war and repressive policy, restricting their international mobility and access to assets, and signalling the criteria of unacceptable conduct. For this reason, individual measures occupy a special place in the sanctions' architecture: they are the most visible form of targeted pressure and often serve as the first, rapidly scalable level of response within package escalation. For the purposes of the present document, it is essential to proceed on the basis that the political logic of listings is expressed not only through their direct effect on a specific person or entity, but also through a broader regime effect—namely, changing the behaviour of surrounding actors, intermediaries, institutions, and international counterparties. Consequently, assessment of the objectives of listings should be conducted within a multidimensional framework combining coercion, deterrence, delegitimation, institutional constraint, and coalition signalling. Such an approach helps to avoid methodological simplification whereby listings are treated either as a purely symbolic gesture or as an instrument that must immediately alter the strategic decisions of the state. In reality, their political logic is considerably more complex and consists in creating targeted, cumulative, and institutionally reproducible pressure on the nodes of decision-making and regime support. It is in this capacity that individual measures become one of the basic political instruments of sanctions policy against the Russian Federation in 2022–2025.

The first key objective of listings is the personalisation of political and institutional responsibility. Unlike broad sectoral measures, which affect functional contours of the economy and the state apparatus, individual sanctions directly identify specific categories of persons and entities as actors associated with the support, implementation, legitimation, or material provision of policies qualified by the sanctions coalition as unacceptable. In relation to the Russian Federation, this is of particular importance, since EU sanctions policy seeks to demonstrate that the international response is directed not only at the state in the abstract, but also at concrete decision-making centres, political beneficiaries, propagandistic and administrative structures, and affiliated entities. This logic strengthens the normative clarity of the sanctions regime by translating political assessment from general

condemnation into targeted qualification of participation. For analysis, this is fundamental, because it is through personalisation of responsibility that the sanctions regime acquires greater political legitimacy within the coalition and clearer communication externally. Consequently, one of the central objectives of listings is not only to create restrictions for a particular listed party, but also to institutionalise that party's status as a participant in sanctions-relevant conduct. This, in turn, affects reputational risks, the behaviour of counterparties, and the possibilities for public diplomatic normalisation. In this way, listings perform a function of politico-legal marking of actors, which is an important element of the overall pressure architecture.

The second objective is the restriction of international manoeuvrability and operational capabilities of listed persons and entities. At the formal level, this is expressed through the standard set of measures (asset freeze, prohibition on making funds/economic resources available, and, for natural persons, entry restrictions), but the political logic here is broader than the sum of legal prohibitions. Inclusion in a sanctions list changes the access regime of the listed party to international channels of interaction: financial, commercial, diplomatic, logistical, and reputational. Even in cases where the direct volume of assets within EU jurisdiction is limited or has been pre-emptively reallocated, the very fact of listing significantly increases compliance risks for banks, service providers, intermediaries, and partners in third countries. For the sanctions' regime against the Russian Federation, this is especially important because some politically and economically significant figures may use complex networks of affiliation, nominee ownership, and cross-border intermediation. Consequently, the objective of listings is not only the immediate "freezing of what is found", but also the creation of a durable regime of impediment to the international activity of listed parties. In analytical terms, this makes it possible to treat listings as an instrument of institutional narrowing of the space for action, rather than merely as a form of targeted punishment. This logic is further reinforced in later packages, where individual measures increasingly interact with anti-circumvention architecture and the broader compliance contour of sanctions. In this way, the political objective of listings becomes closely linked to their enforcement and behavioural function.

The third objective is the delegitimation of elite, administrative, propagandistic, and quasi-institutional support structures of Russian policy. In the political sphere, this is one of the most significant functions of listings, because they enable the sanctions coalition not only to restrict specific persons, but also publicly to delineate the circle of actors whose participation is considered sanctions-relevant. In the case of the Russian Federation, this extends not only to formally state officials, but also to representatives of para-state business, the media sphere, military-industrial and administrative structures, and organisations through which political mobilisation, information support, and institutional resilience of the regime are maintained. For analysis, this matters because in such circumstances listings function not merely as an instrument of individual pressure, but as a structurally delegitimising signal addressed to broader elite and institutional networks. Consequently, one of the objectives of individual sanctions is to increase the political cost of loyalty, participation, and facilitation. Even where this does not lead to immediate withdrawal from participation, it increases the risks of international isolation, complicates cross-border activities, and changes the long-term calculations of some actors. In this sense, the political logic of listings is closely connected with the concept of "selective pressure on the supporting infrastructure of the regime". Such an approach allows their effectiveness to be assessed more precisely: not only by changes in the behaviour of a particular listed party, but also by changes in the operating conditions of the broader support network. In this way, listings become an important mechanism of political fragmentation and reputational cost inflation for participation in sanctions-relevant structures.

The fourth objective is coalition signalling and the reproduction of a unified political line of the EU and its partners. Individual listings have high political "visibility": unlike many complex technical restrictions, they are easily communicated publicly, quickly interpreted as concrete action, and allow the coalition to demonstrate the consistency and expandability of the pressure regime. In this respect, their political logic includes the function of confirming coalition resolve: each new expansion of the list demonstrates

that the sanctions regime is not a one-off reaction, but is maintained and updated in response to continuing unacceptable conduct. For the EU, this also has internal significance—listings enable Member States to sustain the common political narrative of sanctions policy even during periods of difficult negotiations over more costly sectoral measures. Consequently, individual measures perform not only an external but also an internal politico-coalitional function. In analytical terms, this is especially important for assessing effectiveness, since by the criterion of direct coercion listings may produce limited effect, while by the criterion of coalition consolidation and signalling they may produce a high effect. Moreover, the public logic of listings influences the behaviour of third countries and private actors by transmitting a list of categories of activity and affiliation that increase sanctions risk. In this way, listings act as an instrument for standardising perceptions of sanctions-unacceptable conduct in the international environment. This makes them a politically significant element not only of pressure, but also of sanctions governance.

The fifth objective is the creation of a targeted instrument of escalation while preserving the politico-legal manageability of the sanctions' regime. Unlike certain broad sectoral measures, individual listings make it possible to intensify pressure comparatively quickly without immediately triggering the largest collateral effects for EU Member States and their economies. For this reason, in the package dynamics of sanctions against the Russian Federation, listings often serve as one of the most operational channels for expanding the regime: the coalition can add new categories of listed parties in response to developments in the conflict, the organisation of referenda / annexation practices, repressive actions, hybrid activity, circumvention schemes, and other grounds. This political logic makes listings an instrument of flexible calibration of pressure. For the analytical document, this is important because it helps to explain why quantitative growth of the lists is maintained even in periods when agreement on new large-scale sectoral restrictions is difficult. Consequently, one of the objectives of listings is to sustain the dynamism of the sanctions regime and to demonstrate its adaptability. At the same time, manageability is achieved through listing criteria, legal procedure, evidentiary basis, and the possibility of subsequent adjustment of the lists. As a result, individual measures perform the role of an "operationally political-legal interface" between the strategy of sanctions pressure and current events. In this way, their significance extends far beyond the symbolic level and becomes structural for the entire package architecture.

The sixth objective is support for the broader compliance and anti-circumvention contour of the sanctions' regime. Although individual listings are traditionally perceived as political and personal measures, in contemporary EU sanctions practice they are increasingly embedded in the logic of preventing circumvention, mapping networks of affiliation, and restricting intermediary infrastructure. In relation to the Russian Federation, this is especially visible as sanctions packages evolve: the listing of specific persons, companies, intermediaries, and structures may be aimed not only at their role, but also at disrupting chains of supply, financing, logistics, and service provision. In political terms, such practice reflects a shift from a narrow understanding of listing as "punishment for status" towards a more functional understanding of listing as an instrument for destabilising support networks. Consequently, the political logic of individual sanctions also includes an element of network impact. For analysis, this means that the objectives of listings must be assessed not only by the personal profile of the listed party (office, visibility, symbolic weight), but also by its position within the infrastructure of facilitation, circumvention, or reproduction of sanctions-relevant activity. Such an approach is particularly important for later packages, where the effectiveness of the regime increasingly depends on the quality of anti-circumvention calibration. In this way, individual measures become part of broader sanctions engineering while retaining political visibility and targeted character. This strengthens their value as a hybrid instrument at the intersection of political pressure and enforcement strategy.

The seventh objective is the formation of a long-term regime of political memory and institutional archiving of responsibility. Inclusion in sanctions lists performs not only a current restrictive function, but also a function of fixing, in official EU acts, certain links, roles, and forms of participation in sanctions-relevant activity. For the political logic of the sanctions' regime, this is important because it

creates an institutional trace that affects subsequent decisions on renewal, expansion, or lifting of sanctions, as well as the broader international framework for interaction with listed parties. In relation to the Russian Federation, this function is particularly significant in the context of a prolonged conflict, where the sanctions regime develops package by package and requires the accumulation of a documented logic of listings. Consequently, one of the objectives of listings is not only immediate impact, but also institutionalisation of sanctions assessment over time. For critical analysis, this is an important aspect because it shows that the effectiveness of listings is not always exhausted within the short-term period of their introduction. They also form a basis for future recalibration of the regime, negotiation conditions, mechanisms of conditional easing or, conversely, further tightening. In this way, individual measures become part of long-term sanctions governance rather than merely a reactive response to events. This is especially important to take into account when assessing prospects of effectiveness in 2026–2027, where significance attaches not only to the number of new listings, but also to the quality of the already accumulated listing architecture.

Finally, within the applied framework of the present document, the objectives and political logic of individual restrictive measures (listings) against the Russian Federation may be summarised as a combination of five interrelated functions: (1) personalisation of responsibility, (2) restriction of international manoeuvrability, (3) delegitimation of supporting structures, (4) coalition signalling, and (5) flexible calibration and maintenance of sanctions-regime dynamism. In addition, as packages evolve, their role in anti-circumvention and network-based sanctions pressure is strengthened. This understanding makes it possible in the subsequent subsections neither to overestimate listings as an instrument of immediate coercion nor to underestimate their political and institutional effectiveness. Consequently, further analysis of the advantages, limitations, and prospects of effectiveness of listings should be based on a multi-criteria approach distinguishing symbolic-political, enforcement, network, and coalition-governance effects. It is precisely this framework that is the most appropriate for assessing the actual role of individual sanctions in the broader political component of the sanctions' regime against the Russian Federation in 2022–2025.

2.2.1.3. Advantages

One of the key advantages of individual restrictive measures (listings) is their high degree of political targeting. Unlike broad sectoral sanctions, which inevitably affect large volumes of economic relations and may generate significant side effects for third parties, listings make it possible to focus pressure on specific persons, organisations, and networks regarded as participants in, beneficiaries of, or operators of sanctions-relevant policy. For the EU and its partners, this is particularly important in political and legal terms, because such an approach helps to uphold the principle of proportionality and to substantiate more clearly the link between the sanction and the ground for its imposition. In relation to the Russian Federation, this advantage is reinforced by the fact that the sanctions regime is directed not only against the state apparatus in the abstract, but also against specific contours of decision-making, resource mobilisation, political legitimation, and support for the war. Consequently, listings provide a more precise configuration of pressure than measures of a general character. In analytical terms, this increases the manageability of the sanctions regime and facilitates subsequent assessment of the logic of designations. In addition, the targeted character of listings reduces political costs for the coalition when explaining sanctions policy to domestic audiences and international partners. In this way, listings function as an important instrument for combining firmness with selectivity in sanctions pressure.

A second substantial advantage of listings is their operational speed and flexibility within the package dynamics of sanctions. In EU practice, individual measures are often one of the fastest channels for scaling up pressure, because adding new persons and entities to lists can be done without the need each time to redesign complex sectoral regimes from the ground up. This does not imply simplicity in legal terms—listings require legal procedure, an evidentiary basis, and institutional coordination—but compared with multilayered trade, financial, or technological restrictions they often make it possible to respond more quickly to new events, actions, or circumvention schemes. For the Russian case, this advantage is of particular importance given the high dynamics of the conflict, the emergence of new

actors, and the need regularly to demonstrate the adaptability of the sanctions' architecture. Consequently, listings perform the function of an "operational contour" of sanctions policy. They enable the coalition to maintain pressure in periods when agreement on more far-reaching measures is difficult, while simultaneously signalling the continuation of political resolve to tighten the regime. In analytical terms, this makes listings an important element of the resilience of sanctions strategy over time. Thus, their advantage lies not only in the substance of the measure, but also in their ability to sustain the rhythm of sanctions governance.

A third advantage is the high public-communication effectiveness of individual sanctions. Listings are readily communicable in political and media terms: they are intelligible to broad audiences, personalise the international response, and make the sanctions regime visually and substantively more "tangible". Unlike many technically complex export or financial measures, which require specialised explanation, the listing of specific persons and entities is quickly understood as a clear act of political qualification and restriction. For the EU and its partners, this matters not only externally but also internally, because it supports the durability of the public narrative of consistency in sanctions policy. In relation to the Russian Federation, this advantage is reinforced by the fact that listings make it possible to demonstrate the targeted nature of the international response vis-à-vis political, administrative, propagandistic, and organisational support structures of the regime. Consequently, listings operate as an instrument not only of pressure but also of political signalling. In analytical terms, this means that their effectiveness should be considered not only in terms of direct restrictions on listed parties, but also in terms of influence on international perceptions, coalition consolidation, and standardisation of sanctions-relevant categories of conduct. In this way, the communicative "visibility" of listings becomes an autonomous advantage rather than merely a secondary effect.

A fourth advantage is the comparatively high compatibility of listings with the logic of coalition sanctions governance. In a multilateral regime, where the EU acts in conjunction with partners (including G7 countries and other states), it is important to have instruments that can be aligned, synchronised, or mutually reinforced even where national legal systems and institutional procedures differ. In this respect, individual sanctions display significant adaptability: listing criteria and legal form may vary, but the model of a targeted list itself transfers well across jurisdictions and supports the effect of cross-jurisdictional pressure. For sanctions policy against the Russian Federation, this is especially significant because the effectiveness of many restrictions depends on the extent to which it is difficult for the listed party to reallocate activities, assets, and channels of interaction across different legal spaces. Consequently, listings strengthen the coalition effect even in the absence of full harmonisation of regimes. In analytical terms, this advantage is reflected in the fact that individual measures contribute to the formation of a common sanctions' ecosystem in which reputational and compliance effects extend beyond the formal boundaries of a particular EU act. In this way, listings become an important element of international coordination of sanctions pressure and increase the aggregate density of restrictions.

A fifth advantage is the combination of political function with enforcement and compliance functions. Individual listings simultaneously serve as a public political signal and as a legally significant trigger for banks, financial intermediaries, insurers, service companies, logistics operators, and other compliance actors. This makes them especially valuable in contemporary sanctions architecture, where a substantial share of actual effect is generated not only by state enforcement in the narrow sense, but also by the preventive behaviour of private actors seeking to reduce the risk of breaching the regime. For the Russian case, this advantage is critical because part of sanctions-relevant activity is conducted through complex cross-border chains and intermediary structures. Consequently, the listing of a specific person or entity may trigger a broader de-risking effect than is directly prescribed by the text of the underlying measure. In analytical terms, this means that the effectiveness of listings cannot be assessed solely by the volume of assets formally frozen; their capacity to reshape the behaviour of private market participants must also be taken into account. In this way, individual measures act as a

“bridge” between political decision and mass compliance implementation practice. This substantially increases their practical value within the sanctions, regime against the Russian Federation.

A sixth advantage is the possibility of selective pressure on the supporting infrastructure of the regime, and not only on its public political centre. In sanctions practice against the Russian Federation, this is particularly important because regime resilience is sustained not by a single level of state administration, but by a complex system of links between political structures, the administrative apparatus, financial-business groups, the media sphere, logistics intermediaries, and other facilitation contours. Listings make it possible to act upon these contours in a differentiated manner, generating pressure not only on “symbolically significant” figures but also on functionally important elements of the infrastructure. This advantage increases further as the sanctions’ regime moves towards an anti-circumvention logic, where what matters is not only the status of the listed party but also its position within networks providing supply, financing, service support, or informational influence. Consequently, listings provide the sanctions coalition with an instrument for targeted disruption or cost inflation of particular nodes of the supporting system. In analytical terms, this strengthens their significance as an element of sanctions engineering rather than merely political demonstration. In this way, individual sanctions can be embedded in a more complex strategy of network-based restriction while retaining high political readability. This makes them especially useful at stages where broad prohibitions are already in place and more fine-grained calibration of the regime is required.

A seventh advantage is the possibility of step-by-step recalibration and adjustment. Unlike many structural sanctions’ decisions, revision of which may require a prolonged political process and substantial negotiation costs, the listings regime by its nature is better suited to regular updating: adding new listed parties, refining identifying data, adjusting grounds, and reviewing the status of particular persons / entities within legal procedure. For the EU, this is important from the perspective of institutional resilience and legal due process, because it makes it possible both to maintain the dynamism of pressure and to preserve a formalised review order. In relation to the Russian Federation, this advantage means that listings may serve as an instrument of continuous adaptation of the sanctions regime to changing patterns of affiliation, circumvention, and redistribution of functions among actors. Consequently, they are better suited to the logic of a prolonged conflict than exclusively static measures. In analytical terms, this advantage is linked to the fact that recalibratability increases the overall survivability of the sanctions architecture and reduces the risk of its rapid “obsolescence” in response to the addressee’s institutional adaptation. In this way, listings function as a mechanism for maintaining the contemporaneity of sanctions pressure over an extended period. This is particularly significant when forecasting effectiveness in 2026–2027.

An eighth advantage is the relatively low political threshold for expanding the regime compared with the costliest sectoral measures. This does not refer to legal simplicity, but to politico-governance configuration: adding new persons and entities to lists more often permits a finer gradation of pressure than measures capable of immediately affecting major trade flows, energy balances, or sensitive segments of the economies of EU Member States themselves. As a result, listings become an important instrument for preserving sanctions dynamism even under conditions of differing sensitivities among Member States to sectoral escalation. For the Russian case, this has strategic significance, since the duration of the sanctions’ regime requires maintenance of coalition operability and regular reproduction of pressure. Consequently, listings help to reduce the risk of political pauses in sanctions policy. In analytical terms, this advantage appears as a supporting mechanism of coalition manageability: even amid difficult negotiations on major measures, the sanctions regime remains “moving” and politically active. In this way, individual measures strengthen the resilience of the sanctions architecture as a whole by serving as a channel of calibrated but constant tightening.

Finally, within the applied framework of the present document, the advantages of individual restrictive measures (listings) against the Russian Federation may be summarised as a combination of the following strengths: (1) targeted character, (2) operational responsiveness, (3) public and signalling effectiveness, (4) coalition compatibility, (5) high compliance convertibility, (6) network impact on

support infrastructure, (7) recalibratability, and (8) maintenance of sanctions-regime dynamism under constraints on sectoral escalation.

2.2.1.4 Limitations and Implementation Problems

Notwithstanding the significant advantages of individual restrictive measures (listings), their practical effectiveness in relation to the Russian Federation is substantially constrained by a range of structural, legal, institutional, and behavioural factors. For an analytically sound assessment, it is important to avoid two extremes: on the one hand, treating listings as a "purely symbolic" measure without practical effect; on the other, expecting targeted sanctions in themselves to be capable of rapidly changing the strategic behaviour of the state and its key politico-administrative structures. In reality, listings are an instrument whose effectiveness depends to a high degree on the quality of the evidentiary basis, the breadth of coalition synchronisation, the maturity of compliance infrastructure, the capacity to trace networks of affiliation, and the resilience of the regime against circumvention. In the Russian case, this is particularly important given the scale of the state, the duration of the conflict, the presence of developed adaptation mechanisms, and the use of external intermediary channels. Consequently, the limitations of listings should be analysed not as isolated "failures", but as systemic parameters of their application in relation to a large and institutionally adaptive addressee. Such an approach preserves analytical balance: it recognises the value of listings within the sanctions architecture while also identifying the limits of their autonomous coercive potential. It is within this framework that the key implementation problems of individual sanctions against the Russian Federation in 2022–2025 are considered below.

The first fundamental limitation concerns the limited direct coercive effect of listings in relation to strategic state decisions. Individual sanctions may significantly complicate the international activity of specific persons and entities and increase reputational and transactional costs, but they do not guarantee automatic transmission of these costs into changes in state policy. In conditions of a centralised political system, high concentration of power, and prioritisation of political-security objectives over economic rationality, personal restrictions often do not lead to immediate policy revision. This is particularly characteristic of the Russian case, because a substantial proportion of listed parties are embedded in a regime system in which loyalty, access to internal resources, and political protection may partially compensate for external constraints. Consequently, an expectation of rapid political effect from expansion of the lists is, in itself, methodologically overstated. In analytical terms, this means that the effectiveness of listings should be assessed primarily through intermediate effects—delegitimation, restriction of manoeuvrability, complication of international operations, coalition signalling—rather than solely through the criterion of immediate changes in decisions of the Russian leadership. Otherwise, there is a risk of a false conclusion of "ineffectiveness" arising from an incorrectly chosen indicator. Thus, the first implementation problem of listings lies not only in the measure itself, but also in politically inflated expectations of its function.

The second limitation is the high dependence of actual effect on the quality of identification of assets, beneficial ownership, and cross-border linkages. Formally, listing a person or entity triggers legally significant prohibitions and obligations; however, the practical scale of impact depends on how effectively sanctioning and compliance actors are able to identify assets, affiliated structures, nominee holders, trust arrangements, and intermediary schemes. In relation to the Russian Federation, this problem is particularly acute, since some sanctions-relevant persons and entities may employ complex mechanisms of ownership reallocation, jurisdictional dispersion, and concealed affiliation. As a result, there may be a substantial gap between the legal act of listing and the real restriction of access to resources. Consequently, one of the key practical limits of listings is their dependence on financial transparency, data-sharing, and investigative/compliance expertise. In analytical terms, this means that an effectiveness assessment based on formal parameters alone (such as the number of additions to the list) without regard to the depth of actual blocking of assets and channels of interaction will be incomplete. Moreover, quantitative growth of listings may create an illusion of increased pressure that

is not always proportionate to the real operational effect. Thus, the implementation problem lies in the fact that legal targeting does not automatically convert into full economic-operational effectiveness.

The third limitation concerns the adaptation of listed parties and support networks to the sanctions' regime. As the sanctions' architecture develops, the Russian Federation and associated actors acquire incentives for institutional learning: relocation of assets, restructuring of ownership schemes, use of nominee entities, redistribution of functions among linked persons and organisations, and transition to new intermediaries and jurisdictions. This does not mean that listings lose their relevance. However, it does mean that their effect becomes more dependent on the speed of updating the lists, the precision of listing criteria, and the quality of anti-circumvention linkage with other measures. For analysis, this aspect is fundamental because it shows that, in a prolonged conflict, listings are not a one-off action but a process of continuous, partly catch-up and partly anticipatory sanctions governance. Consequently, one of the key implementation problems becomes the pace of reaction of the sanctions coalition as compared with the pace of adaptation by the addressee and intermediary infrastructure. If regime updates lag, some persons and networks will have time to redistribute risks and reduce the practical effect of listing. In this sense, listings are particularly vulnerable where they face organised, well-resourced, and transnationally flexible adaptation. Thus, the implementation problem is dynamic rather than merely static: what matters is not simply the existence of the measure, but the capacity to maintain its relevance under conditions of constant evolution of circumvention schemes.

The fourth limitation is incomplete international synchronisation of sanctions regimes and the existence of jurisdictional "windows". Even where coordination between the EU and partners is high, some states do not join sanctions, join only partially, or implement regimes that differ in depth and procedure. For listings, this is especially consequential because their practical effect depends on the breadth of the space within which access to financial and operational channels is constrained for the listed party. Where significant jurisdictions remain in which a person or affiliated structure may continue operations with limited sanctions risk, the overall effect of targeted pressure is reduced. In relation to the Russian Federation, this limitation is reinforced by the scale of its external economic and political ties and by its ability to redirect part of its activity into alternative channels. Consequently, one of the systemic implementation problems of listings is that they are most effective under conditions of broad cross-jurisdictional reproducibility, but lose substantial density of effect when the international sanctions field is fragmented. In analytical terms, this means that the effectiveness of listings cannot be assessed solely within the normative perimeter of the EU; the actual geography of available substitutes for listed parties must also be taken into account. Thus, the limitations of listings are closely linked to the limits of international coalition universalisation of the sanctions' regime.

The fifth limitation is legal vulnerability and the need to maintain a high standard of evidence and procedural propriety. In EU sanctions practice, individual measures must be not only politically expedient but also legally substantiated, since they affect the rights of specific persons and organisations and may be challenged in court. On the one hand, this is a strength of the European legal order; on the other, it creates a practical constraint on the speed and depth of listings, especially in complex cases of affiliation, indirect participation, or rapidly changing roles of listed parties. For the Russian case, this is of particular significance because of the scale of the sanctions' corpus and the need regularly to update listing grounds, factual statements, and legal argumentation. Consequently, part of the implementation problems of listings are connected not with "political weakness", but with the EU's institutional obligation to ensure legal robustness of measures. In analytical terms, this matters because the politically desirable speed of expansion of the lists may at times conflict with the requirements of evidentiary quality. This tension may slow updating of listings or increase the risk of partial legal vulnerabilities. Thus, legal due process simultaneously enhances the legitimacy of the regime and constrains its operational speed, which must be taken into account in critical assessment of effectiveness.

The sixth limitation is the gap between the political visibility of listings and the depth of their actual impact. Individual sanctions often have high media and political salience, which makes them a

convenient instrument for public demonstration of sanctions activity. Yet this very “visibility” may generate an analytical and political illusion that expansion of the list automatically means a proportionate increase in pressure on the regime as a whole. In reality, effect varies substantially depending on the role of the listed party, the structure of its external assets, the degree of international dependence, and its capacity to use substitute channels. For the analysis of sanctions against the Russian Federation, this is particularly important because, in public discourse, symbolically significant listings and functionally critical listings are often conflated, although their practical contribution to constraining the support infrastructure may differ. Consequently, one of the implementation problems is the risk of shifting emphasis towards politically resonant designations at the expense of systematic work on less visible but operationally important nodes of circumvention and facilitation networks. In analytical terms, this requires distinguishing the communicative effect of a measure from its infrastructural effect. Thus, listings may be politically successful as a signal while only limitedly effective as an instrument of operational weakening—and vice versa. Such heterogeneity must be built into the criteria for assessing this sanctions block.

The seventh limitation is the difficulty of assessing causal effect (the attribution problem). In relation to the Russian Federation, individual listings operate simultaneously with broad economic, financial, technological, transport, legal, and informational measures, and against the background of military, political, and macroeconomic processes. Under such conditions, it is extremely difficult to isolate which specific outcome was caused by a given listing or series of listings, and which was caused by the cumulative effect of other sanctions, Russia’s internal policy, market conditions, or the actions of third states. Consequently, analysis of the effectiveness of listings inevitably encounters an attribution problem. For the methodology of the present document, this is of fundamental importance: assessment should not rely on simplified linear linkages of the type “listed—change occurred”. A more complex approach is required, taking into account the probabilistic and cumulative nature of impact. In analytical terms, this means that intermediate indicators are especially significant for the listings block (growth of compliance risks, complication of interaction channels, changes in intermediary structures, reputational constraints), rather than only final political outcomes. Thus, the implementation problem also consists in the limited measurability of direct effect, which complicates both policy assessment and public communication of sanctions effectiveness.

The eighth limitation is the risk of institutional “list inflation” and reduced analytical focus. As the sanctions regime expands over time, the number of listings increases, and this may in itself be justified by the development of the conflict and the emergence of new grounds. However, in the absence of sufficient prioritisation, there is a risk that the sanctions list begins to perform too many functions simultaneously—political signalling, punishment, anti-circumvention tool, media demonstration, response to current events—which makes strategic and analytical hierarchisation of objectives more difficult. For the Russian case, this risk is particularly relevant given the duration of package escalation and the composite nature of sanctions grounds (war, repression, disinformation, circumvention, support networks, etc.). Consequently, one of the implementation problems is maintaining the quality of sanctions design within a growing corpus of listings. In analytical terms, this is expressed in the need to distinguish listings by functional profile and expected mechanism of effect, rather than treating the whole corpus as homogeneous. Otherwise, the precision of both critique and recommendations for strengthening the regime is reduced. Thus, quantitative expansion of the lists, while a sign of sanctions activity, simultaneously creates a risk of dilution of strategic focus if not accompanied by qualitative typologisation and periodic review of listing logic.

The ninth limitation is the limited capacity of listings to affect deep socio-political mechanisms within the Russian Federation without support from other instruments. Individual measures may increase the cost of participation for elites and infrastructural actors, but in themselves they rarely alter the basic parameters of domestic political mobilisation, information control, rent redistribution, and administrative coercion on which regime resilience may depend. This is particularly important for the present document, because part of the expected political effects of sanctions in public debate is often

implicitly linked to assumptions of domestic political transformation. Consequently, analysis of listings must recognise the limits of their autonomous impact on the internal political dynamics of a large authoritarian state. In analytical terms, this does not reduce their significance as an element of foreign-policy pressure, but it does require realistic task-setting: listings are more effective as an instrument of delegitimation, restriction of manoeuvrability, fragmentation of external support contours, and increase of transactional costs than as a standalone mechanism of political transformation. Thus, the implementation problem also lies in incorrect extrapolation of the capacities of the measure to objectives for which it is not designed in isolation from other policy instruments.

Finally, within the applied framework of the present document, the limitations and implementation problems of individual restrictive measures (listings) against the Russian Federation may be summarised as follows: (1) limited direct coercive effect, (2) dependence on the quality of identification of assets and networks, (3) adaptation of listed parties and intermediaries, (4) incomplete international synchronisation, (5) legal and evidentiary constraints, (6) gap between political visibility and operational effect, (7) attribution problem, (8) risk of list inflation, and (9) limited autonomous impact on internal political dynamics.

2.2.1.5 Prospects of Effectiveness (2026–2027)

The prospects for the effectiveness of individual restrictive measures (listings) against the Russian Federation in 2026–2027 should be assessed in the logic of conditional effectiveness, rather than in the logic of guaranteed political effect. By the beginning of 2026, the EU sanctions architecture against the Russian Federation had already acquired a high degree of density and institutional maturity, while listings had become a continuously reproduced instrument of package escalation, including the 19th package (23 October 2025), which added new individual designations alongside economic and anti-circumvention measures. In such a configuration, the key question for 2026–2027 is no longer so much the quantitative expansion of lists as the quality of listing design, its network precision, legal robustness, and integration with the anti-circumvention contour. Consequently, the prospects of this instrument will be determined by the ability of the EU and its partners to move from predominantly reactive expansion of lists to a more analytically calibrated model of targeting. For the purposes of the present document, this means that the forecast of effectiveness should be constructed across several criteria: political-signalling, operational-restrictive, coalition-governance, compliance, and anti-circumvention. Such an approach avoids overstated expectations of listings as an autonomous coercive mechanism while also avoiding underestimation of their importance within the broader sanctions' architecture.

The first basic conclusion is that, in 2026–2027, the political-signalling and coalition-consolidating effectiveness of listings is likely to remain high, even if their direct influence on strategic decisions of the Russian leadership remains limited. Individual sanctions continue to be one of the most "visible" and manageable instruments of sanctions policy: they make it possible to demonstrate continuity of pressure, personalise responsibility, and sustain the public-communication contour of the sanctions regime. In circumstances where agreement on major sectoral measures may be complicated by divergent interests within the EU, listings retain significance as a channel for regular updating of the sanctions' agenda. At the same time, by 2026 there are already signs of possible political friction concerning further packages, which indicates the importance of intra-EU coordination as a factor of resilience for continued listing dynamics. Consequently, even where listings remain a functioning instrument, their effectiveness in the coalition dimension will depend on the EU's ability to maintain procedural and political coherence. In analytical terms, this means that the key strength of listings (operational responsiveness) in 2026–2027 will increasingly be constrained by the political throughput capacity of the coalition. Nevertheless, precisely in terms of signalling, reproduction of the sanctions' narrative, and institutional maintenance of pressure, the prospects of this instrument remain strong.

The second conclusion is that the operational-restrictive effectiveness of listings in 2026–2027 will grow not from the number of new designations, but from the depth of network targeting. After multiple waves of listing high-profile political figures, officials, and visible organisations, the marginal return from new

"symbolic" listings declines. In this situation, priority shifts to targeting functionally significant nodes: (1) intermediaries, (2) service structures, (3) logistics operators, (4) suppliers of dual-use components, (5) financial-transactional contours, and (6) persons and companies facilitating circumvention and redistribution of sanctions risks. Consequently, if this trajectory is maintained, the prospects for effectiveness of listings in 2026–2027 will depend on the quality of data fusion between the political sanctions track and the compliance/investigative track. For the document, this means that the forecast for listings should be linked to the development of evidentiary infrastructure, inter-agency coordination, and data-sharing, and not only to political decisions to expand lists. In other words, future effectiveness will be determined by the extent to which listings are transformed into an instrument of network disruption, rather than merely personal restriction.

The third conclusion concerns integration of listings with the anti-circumvention architecture, which is likely to become the principal enhancer of their effectiveness in 2026–2027. As EU packages have evolved, individual and entity-based measures have increasingly been linked to the task of preventing sanctions circumvention through third countries, nominee structures, and intermediary chains. In forecast terms, this means that listings will be most effective where they are used not in isolation, but as part of integrated sanctions engineering: together with export controls, financial restrictions, transport-logistics measures, services controls, and secondary compliance consequences for private actors. Consequently, in 2026–2027 the expected effectiveness of listings is higher in segments connected with breaches/circumvention of already existing regimes than in segments where a direct political breakthrough is expected from them. This is a fundamentally important correction for the criteria of assessment: the effectiveness of a listing should increasingly be measured not only by the fate of the listed party, but also by the degree to which it disrupts that party's (or its network's) ability to maintain transactions, supplies, and operational linkages.

The fourth conclusion is that the prospects of effectiveness of listings will depend substantially on the quality of legal preparation and evidentiary robustness of new designations. As the number and complexity of sanctions cases increase, the burden on legal reasoning, statement of listing grounds, identification of connections, and updating of factual bases also increases. If, in 2026–2027, the EU expands lists primarily in an accelerated mode without sufficient evidentiary detail, this may increase risks of legal vulnerability and reduce the durability of some measures. By contrast, improvement of evidentiary standards, more precise formulation of listing grounds, and regular review of older entries may strengthen not only legal robustness but also operational effect (through better applicability in the compliance environment). Consequently, one of the key conditions for the effectiveness of listings in 2026–2027 is a shift from extensive growth towards qualitative maintenance of the sanctions' corpus. In analytical terms, this means that an important indicator of future effectiveness will be not only the number of new listed parties, but also the quality of their legal profiling. For the present document, this is especially important because critical assessment must treat the European legal framework not as a sign of weakness, but as a factor of long-term institutional resilience of the sanctions' regime.

The fifth conclusion is linked to the coalition-geographical factor: the effectiveness of listings in 2026–2027 will depend directly on the degree of cross-jurisdictional reproducibility of sanctions consequences. Even a well-prepared listing has limited effect if the listed party retains access to significant alternative jurisdictions, payment channels, corporate shells, and service providers with low sanctions sensitivity. In this context, the prospects of the instrument are determined not only by EU action, but also by synchronisation with partners and by the EU's ability to influence the behaviour of third-country intermediaries through a combination of listings, export controls, and financial compliance. Consequently, in 2026–2027 an increase in the effectiveness of listings is most likely where this external perimeter is expanded—not necessarily through formal universalisation of sanctions, but through increasing the cost of cooperation with already listed persons and entities. For analysis, this means that forecasts regarding listings should include the factor of the EU's "external compliance gravity", rather than being limited to formal acts of the Council.

The sixth conclusion is that the risk of declining marginal returns from listings in 2026–2027 will increase if the predominantly quantitative logic of list expansion is maintained. After many rounds of sanctions, there is a danger of institutional inflation of listings: new additions continue to demonstrate activity, but their aggregate operational contribution becomes less pronounced where there is no prioritisation by functional effect. For the Russian case, this is particularly important because the sanctions environment is already dense and listed parties and their networks have partly adapted to the existing regime. Consequently, prospects of effectiveness are directly linked to a transition towards typologised listing management: differentiation of sanctions objectives by category (political signalling, anti-circumvention, disruption of supply chains, delegitimation, human rights track, etc.) and selection of corresponding designation criteria. Otherwise, there is an increasing risk that list expansion will strengthen primarily the symbolic effect while producing only limited growth in material pressure. In analytical terms, this means that for 2026–2027 the key question is not "how many new listings", but "what mechanism of effect attaches to each new block of listings". This framing is particularly important for the subsequent section containing recommendations for strengthening the sanctions regime.

The seventh conclusion concerns the prospects for measurability of effectiveness: in 2026–2027, the effectiveness of listings will be better assessed through intermediate indicators rather than only final political indicators. Since direct attribution of "listing → change in state policy" remains methodologically weak, practical policy assessment should rely on a set of more sensitive indicators: growth in compliance refusals, complication of payment routes, lengthening of intermediary chains, increased transaction costs, reduction in the number of available service providers, frequency of corporate restructuring, and signs of forced institutional adaptation by listed parties. Consequently, prospects of effectiveness in 2026–2027 also depend on the extent to which the EU and its partners (as well as the research community and analytical centres) can improve the monitoring system for the actual impact of listings. For the present document, this means the need to embed in advance a multi-criteria model of assessment, rather than limiting analysis to the number of acts and listed parties. Otherwise, even genuinely effective listings may appear "weak" in public interpretation if measured by unsuitable metrics.

The eighth conclusion is that the most realistic scenario for the effectiveness of listings in 2026–2027 is the strengthening of their role as an instrument of selective deterrence, delegitimation, and network restriction, rather than as a standalone mechanism of strategic coercion of the Russian Federation. This does not diminish their significance; on the contrary, it clarifies their real function in a mature sanctions' architecture. If package logic is maintained, the anti-circumvention component develops, and targeting quality improves, individual measures may materially strengthen the overall density of the sanctions' regime, increase the cost of participation in the supporting contours of the war, and narrow the international space for action available to sanctions-relevant actors. However, expecting from them an autonomous and rapid effect at the level of key strategic decisions of the state in 2026–2027 would be methodologically unsound. Consequently, critical analysis of prospects should proceed on the basis of a "high utility, bounded coercion" model: high utility as an element of integrated pressure, with limited autonomous coercive potential.

Finally, within the applied framework of the present document, the prospects for the effectiveness of individual restrictive measures (listings) against the Russian Federation in 2026–2027 may be summarised as follows: (1) a high likelihood of preserving political-signalling and coalition effectiveness; (2) a moderate-to-high potential for growth in operational effect subject to network targeting; (3) a high potential for enhancement through anti-circumvention integration; (4) a critical dependence on evidentiary and legal robustness; (5) a substantial dependence on cross-jurisdictional coordination; and (5) a risk of declining marginal returns under quantitative list inflation.

2.2.1.6 Conclusion

Individual restrictive measures (listings) in the EU's sanctions policy against the Russian Federation in 2022–2025 confirmed their status as one of the cores and most resilient instruments of political pressure. Their key role lies not in autonomous strategic coercion of the state towards an immediate change of course, but in the creation of a targeted, legally formalised, and institutionally reproducible regime of pressure on persons, entities, and networks linked to decision-making, support for the war, implementation of repressive policy, information support, and sanctions circumvention. In this sense, listings should be assessed as an instrument of high political utility with limited autonomous coercive potential. This conclusion is consistent both with their legal construction within the EU system and with the actual logic of their use within package escalation. For the purposes of the present analytical document, this is of fundamental importance, because it helps to avoid a methodological error whereby listings are assessed against a criterion that does not fully correspond to their functional purpose. Consequently, the overall assessment should be built not around the question "why listings did not, by themselves, change Russia's strategy", but around the question "which functions they actually perform within the broader architecture of pressure and how effectively those functions are implemented". It is precisely this framing that makes the critical analysis substantively accurate and practically policy-relevant.

The first overall conclusion is that listings demonstrate high effectiveness in the functions of personalisation of responsibility, delegitimation, and coalition signalling. They enable the EU and its partners to translate the international-political assessment of the Russian Federation's actions and those of supporting actors from the level of general condemnation into a targeted format of sanctions designation. This strengthens the normative clarity of the sanctions' regime, enhances its public legibility, and supports coalition consolidation, especially in periods when agreement on broader sectoral measures requires substantial political effort. In relation to the Russian Federation, this effect has enduring significance, because the sanctions regime is developing over a prolonged period and requires instruments for regular reproduction of the political line. Consequently, in terms of political communication and institutional confirmation of sanctions resolve, listings demonstrate high practical value. In analytical terms, this means that they cannot properly be classified as "merely symbolic" measures: in this context, the symbolic-political function is itself part of the real mechanism of pressure. In this way, listings form an important layer of sanctions governance that supports the resilience of the overall architecture of restrictions.

The second overall conclusion is that listings demonstrate a significant but uneven operational effect, which depends substantially on the quality of targeting, the depth of the evidentiary basis, and integration with the compliance and anti-circumvention contour. The most visible practical effect is not necessarily achieved in cases involving the most public-facing listed parties, but rather where a listing affects functionally important network nodes—intermediaries, logistics and service structures, financial-transactional channels, affiliated companies, and other elements of support infrastructure. This means that the effectiveness of individual sanctions is determined not only by the status of the listed party, but also by its position within the network of support, circumvention, or reproduction of sanctions-relevant activity. Consequently, for the purposes of further analysis and recommendations, it is critically important to move from a predominantly status-based understanding of listings to a more network-based understanding. In analytical terms, this is one of the central lessons of section 2.2.1: the quality of sanctions design becomes more important than simple quantitative expansion of the list. Thus, listings are most effective when embedded in broader sanctions engineering, rather than being treated as isolated political acts.

The third overall conclusion is that the principal limitations of listings are systemic rather than incidental. These include limited direct coercive effect in relation to strategic state decisions, dependence on the quality of identification of assets and networks, adaptation by listed parties and intermediary infrastructure, incomplete international synchronisation, legal and evidentiary constraints, and the difficulty of direct attribution of outcomes. These limitations do not mean that the instrument is

unsound; rather, they define realistic limits of its application and indicate the need for a proper assessment framework. For the Russian case, this is especially important given the scale of the state, the duration of the conflict, and the high adaptability of the addressee. Consequently, criticism of listings should be directed not at the fact of their use as such, but at the quality of their design, prioritisation, legal maintenance, and integration with other measures. In analytical terms, this makes it possible to preserve a balance between recognising the utility of the instrument and identifying its vulnerabilities. In this way, listings should be regarded as a necessary, but by themselves insufficient, element of sanctions pressure.

The fourth overall conclusion is that, in the 2026–2027 perspective, the most likely and realistic scenario for strengthening the effectiveness of listings is linked not to extensive growth in the number of designations, but to qualitative improvement in their application. This concerns, above all, improving the network precision of targeting, strengthening evidentiary standards, regular review and typologisation of lists, reinforcing linkage with anti-circumvention mechanisms, and improving cross-jurisdictional coordination of sanctions consequences. If a predominantly quantitative logic is maintained, the risk of "list inflation" increases, whereby the political visibility of new designations outpaces the increase in their material operational effect. Consequently, the future effectiveness of listings will be determined by the sanctions coalition's ability to move from a model of continuous expansion to a model of strategically calibrated listing management. For the present document, this is especially important because this conclusion directly links the critical analysis to future recommendations for strengthening the sanctions regime. In this way, the listings section provides not only an evaluative basis but also a design-oriented basis for the subsequent sections of the document.

The fifth overall conclusion is that listings in the political sanctions block of the EU regime against the Russian Federation perform a hybrid function—simultaneously political, enforcement-related, compliance-stimulating, and partly infrastructure-destabilising. It is precisely this hybridity that explains why their real utility is often underestimated when analysed narrowly through the prism of direct political coercion. In a mature sanctions architecture (such as that formed in relation to the Russian Federation by 2025), individual measures operate as an interface between political decision, legal mechanism, and behavioural response by private and institutional actors. Consequently, their contribution should be measured against multiple criteria: personalisation of responsibility, restriction of international manoeuvrability, reputational cost inflation, growth of compliance risks, disruption of facilitation networks, coalition signalling, and maintenance of regime dynamism. In analytical terms, this requires a multi-criteria assessment model and rejection of one-dimensional conclusions of "effective/ineffective". In this way, listings occupy a stable place in EU sanctions policy as an instrument of high applicability in conditions of prolonged conflict and multi-level pressure.

Overall, individual restrictive measures (listings) should be classified as a structurally necessary and politically highly useful element of the EU sanctions regime against the Russian Federation, possessing stable effectiveness in tasks of delegitimation, targeted restriction, and coalition governance, but with limited autonomous capacity for the strategic coercion of the state. The practical value of this instrument in 2026–2027 will depend primarily on the quality of its further calibration, rather than on mechanical expansion of the volume of listings.

2.2.2. Visa and Diplomatic Restrictions

2.2.2.1 Legal Instruments and Dates

EU visa and diplomatic restrictions in respect of the Russian Federation in 2022–2025 constitute a mixed normative construction: part of the measures is formalised as visa-policy decisions (suspension of the visa-facilitation agreement), part operate through the application of general EU visa law (the Visa Code), while certain elements of the diplomatic track are introduced as provisions within the sanctions framework (including amendments to Regulation (EU) No 833/2014). This architecture requires each act

to be recorded separately by its legal type, date, scope of application, and operational effect, and only then linked to the sanctions' dynamics (packages, where applicable).

A. Suspension of the EU–Russia Visa Facilitation Agreement

1. Council Decision (EU) 2022/333—partial suspension (25 February 2022)
- Date of adoption: 22 February, 2022
- Institution: Council of the European Union
- Type of act: Council Decision (EU)
- Full title: *Council Decision (EU) 2022/333 of 25 February 2022 on the partial suspension of the application of the Agreement between the European Community and the Russian Federation on the facilitation of the issuance of visas to the citizens of the European Union and the Russian Federation*
- OJ publication: *OJ L 54, 25.2.2022, pp. 1–3*
- Scope/effect: suspension of "facilitated" visa procedures for certain categories of applicants (i.e., a targeted curtailment of the facilitation regime), serving as the first normative step in tightening visa policy in response to the escalation of the war.
- Link to packages: politically correlated with the early 2022 packages, but legally a standalone instrument within the visa track.

2. Council Decision (EU) 2022/1500—full suspension (9 September 2022; application from 12 September 2022)
- Date of adoption: 9 September, 2022
- Institution: Council of the European Union
- Type of act: Council Decision (EU)
- Full title: *Council Decision (EU) 2022/1500 of 9 September 2022 on the suspension in whole of the application of the Agreement between the European Community and the Russian Federation on the facilitation of the issuance of visas to the citizens of the European Union and the Russian Federation*
- OJ publication: *OJ L 234I, 9.9.2022, pp. 1–3*
- Key legal effect: termination of the visa "facilitation" regime in full; the Council explicitly notes that, following this decision, general rules under the EU Visa Code apply to Russian nationals.
- Practical effect: higher visa fees, stricter documentary requirements, potentially longer processing times, and a more limited practice of issuing multiple-entry visas—i.e., a shift from a "facilitated" to the general visa regime.

B. General EU visa regime as the legal framework after suspension

3. Regulation (EC) No 810/2009 (Visa Code)—the baseline legal regime for short-stay visas
- Date of adoption: 13 July, 2009
- Institutions: European Parliament and Council
- Type of act: Regulation (EC)
- Full title: *Regulation (EC) No 810/2009 of the European Parliament and of the Council of 13 July 2009 establishing a Community Code on Visas (Visa Code)*
- OJ publication: *OJ L 243, 15.9.2009, pp. 1–58*
- Role in this block: following the full suspension of the visa-facilitation agreement with Russia, the Visa Code becomes the immediate normative basis for consular practice in processing Russian nationals' applications for short-stay Schengen visas. The crucial point is that the restrictive effect in this area is ensured not by a "sanctions regulation", but by a return to general EU visa law.

C. Further calibration of visa practice for Russian nationals

4. Commission Implementing Decision—"adapted rules" on multiple-entry visas (6 November 2025)
- Date of adoption: November 6, 2025
- Institution: European Commission (DG HOME)
- Type of act: Commission Implementing Decision

- Full title (as in the document): *Commission Implementing Decision of 6.11.2025 establishing adapted rules on the issuing of multiple-entry visas to Russian nationals residing in the Russian Federation and applying in the Russian Federation for short-stay visas*
- Publication/access: issued as an official DG HOME document
- Key effect: establishment of specific (adapted) rules for issuing multiple-entry visas to Russian nationals, shifting practice towards a stricter model with a security and enhanced-control focus (in effect, reducing the "automaticity" of multiple-entry visas and strengthening case-by-case scrutiny).
- Place in sanctions logic: this is not a "sanctions package" in the narrow sense, but a visa-security calibration consistent with the wider logic of foreign-policy pressure and risk management.

D. Diplomatic track (movement of Russian diplomats) as part of late sanctions packages

5. Council Regulation (EU) No 2025/2033—amendments to Regulation (EU) No 833/2014 (23 October 2025; 19th package)
- Date of adoption: 23 October 2025
- Institution: Council of the European Union
- Type of act: Council Regulation (EU) (amending regulation)
- Full title: *Council Regulation (EU) 2025/2033 of 23 October 2025 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine*
- Role: this act is key because it demonstrates that elements of "diplomatic restrictions" may be introduced not via a standalone visa decision, but through the sanctions' regulation No 833/2014 itself, in a logic of security/counter-intelligence risk management and control of movements.

6) Official articulation of the diplomats' movement measure: Council press release and Commission explanation (23 October 2025)
- Council press release (19th package, 23 October 2025): the Council explicitly refers to "strengthening control over the movement of Russian diplomats across the EU".
- Commission explanation (19th package, 23 October 2025): the Commission clarifies the operational mechanics: an advance-notification obligation is introduced for trips by Russian diplomats within the EU beyond the Member State of accreditation; in addition, Member States may introduce an authorisation requirement for entry/movement on the basis of visas/residence permits issued by another Member State, with the stated purpose of countering "hostile intelligence activities".

2.2.2.2 Objectives and Political Logic

The objectives of visa and diplomatic restrictions within the EU sanctions architecture against the Russian Federation in 2022–2025 should be understood as a multi-component political and governance instrument, in which legal mechanisms of visa policy and the diplomatic regime are used to (1) reduce the addressee's international manoeuvrability and institutional presence, (2) increase costs and risks for certain categories of Russian actors, (3) constrain operational capabilities in the sphere of influence and intelligence activity, and (4) sustain coalition signalling and the normative framework of response. Unlike individual listings, which directly personalise responsibility through specific designations, the visa–diplomatic block operates through access and mobility regimes, i.e., through systemic tightening of entry conditions into the European space and regulation of physical movement. In its political logic, these measures sit at the intersection of sanctions and security policy: some elements serve a pronounced foreign-policy function of pressure and delegitimation, while others function as risk management and access control under conflict conditions. Consequently, assessment of the effectiveness of this block must consider not only a "punitive" dimension, but also the security and coalition-resilience dimension, as well as the prevention of the use of visa and diplomatic channels for hostile activities. This framework explains why EU visa measures against the Russian Federation go beyond symbolic decisions and are framed as a sequenced normative reconfiguration of access and control.

The first core objective is to constrain institutional normalisation and reduce the political "ordinariness" of interaction with the Russian Federation in the context of war. The full suspension of the visa facilitation agreement and the return to the general rules of the Visa Code have not only an administrative-consular meaning. They fix a political position of the EU: relations with Russia cannot remain in a "standard" facilitated mode if Russia is treated as a state violating fundamental norms of European security. In this sense, visa restrictions perform a politico-normative marking function: they signal the end of a previously "privileged" access regime and shift interaction into a stricter, more formalised, and more controlled format. Consequently, the objective is not merely to make travel more difficult, but to send an institutional signal that the former level of trust and procedural facilitation has been withdrawn. For coalition governance, this is important because it establishes a durable framework in which normalisation is treated as conditionally possible only if baseline conditions change. In this way, visa measures operate as an element of political isolation and delegitimation, complementing economic and personal sanctions.

The second objective is selectively to constrain mobility and increase transaction costs for Russian actors seeking to use European space for business, political, communicative, and other purposes. Following the full suspension of the visa facilitation agreement, higher fees, increased documentary requirements, and a stricter practice on multiple-entry visas shift mobility of Russian nationals into a higher-cost and higher-uncertainty regime. In the political logic of the sanctions' regime, this has a dual function. On the one hand, it reduces the convenience and predictability of access to the EU, constituting a form of pressure and narrowing the possibilities for "normal" cross-border activity for categories associated with regime support or benefiting from global mobility. On the other hand, it increases sensitivity to compliance risks on the part of consular and border authorities, producing stricter filtering and reducing opportunities for abuse of the visa regime. Consequently, visa measures operate not as a mass punishment of the population, but as an instrument of systemic tightening of access conditions embedded in the logic of proportionality and risk management. For effectiveness assessment, this matters because the effect is expressed not only in quantitative visa-issuance figures, but also in the altered control regime and due-diligence practice applied to applicants.

The third objective is to strengthen the counter-intelligence and security contour through restrictions on diplomatic and quasi-diplomatic mobility. The strengthening of controls over the movement of Russian diplomats across the EU (in the logic of the 19th package) demonstrates a clear shift from classical visa regulation to the management of operational risks. The political logic of this measure is linked to the fact that diplomatic status may be used not only for lawful inter-state communication, but also as an infrastructural resource for activities qualified by the EU as hostile (including intelligence and hybrid operations). Consequently, control over diplomats' movement performs two interrelated functions: it reduces freedom of operational manoeuvre while increasing observability and predictability of diplomatic activity. Institutionally, the measure also reinforces discipline among Member States by introducing a stricter notification/authorisation regime for travel beyond the state of accreditation. In this way, the diplomatic contour of visa-related restrictions is not "symbolic", but a functional security-management instrument under conditions of high-intensity conflict. For subsequent effectiveness analysis, this means that assessment criteria must include not only political isolation, but also parameters of reduced operational risk and constrained space for hostile activity.

The fourth objective is to increase the resilience of the sanctions regime by reducing "grey zones" of movement and access that may be exploited to circumvent other restrictions. Visa regimes are closely linked to financial and service restrictions: physical presence in Europe facilitates a range of operations, including organising intermediation, managing assets, establishing contacts with counterparties, executing documentation, and other actions that may support sanctions evasion. Consequently, tightening visa procedures and restricting diplomatic mobility create an additional barrier that increases the cost and complexity of circumvention schemes. This does not automatically eliminate circumvention, but it shifts part of the activity into more complex routes and increases detection risk. Analytically, this shows that visa and diplomatic restrictions form part of the anti-circumvention

ecosystem even where they are formally framed as visa law rather than as a sanctions' regulation. Thus, the political logic of visa measures includes an infrastructural component: constraining the physical operationality of sanctions-relevant networks.

The fifth objective is coalition signalling and maintenance of intra-EU coherence. Decisions to suspend the visa facilitation agreement and subsequent calibration of visa practice convey an important political signal both externally and internally. Externally, they demonstrate to Russia and third countries that the sanctions response affects not only markets and finance, but also access to European space as a political and institutional privilege. Internally, these measures support the standardisation of practice, reduce heterogeneity of Member State approaches, and reinforce the sense of a common sanctions policy. At the same time, visa measures are traditionally a sensitive area of national competence and public opinion; consequently, agreeing and sustaining a unified approach is itself a governance challenge. In analytical terms, this means that the effectiveness of visa–diplomatic restrictions includes a coalition durability parameter: the EU's capacity to maintain a common line amid political and humanitarian debates over permissible exceptions, applicant categories, and the balance between restriction and protection of humanitarian channels. Thus, visa measures function not only as pressure on the addressee, but also as an instrument of institutional self-organisation of the sanctions' coalition.

The sixth objective is selectivity and manageability in the context of proportionality and humanitarian exceptions. Visa policy, unlike certain economic prohibitions, inevitably engages humanitarian cases, family circumstances, education, medical travel, and other categories for which the EU and Member States must maintain legally and politically robust procedures. Consequently, the political logic of visa restrictions includes continuous calibration: tightening must not eliminate the possibility of exceptions necessary under human rights considerations and international obligations. Practically, this means that the effectiveness of visa measures depends on how clearly exceptions are defined and on ensuring that they do not become a systemic loophole for circumvention. For effectiveness analysis, this matters: excessively broad exceptions reduce the restrictive effect, while an overly rigid regime without manageable exceptions may generate reputational and political risks for the coalition itself. Consequently, visa measures are a foreign-policy pressure instrument that must preserve a balance between political objectives and legal manageability. This distinguishes them from purely economic prohibitions and requires a distinct assessment logic.

The seventh objective is complementarity with other types of sanctions and reinforcement of their cumulative effect. Visa and diplomatic restrictions do not replace listings, sectoral measures, or financial prohibitions, but they can strengthen them by constraining physical mobility and institutional presence. This is particularly important in relation to the Russian Federation, since a significant share of adaptation mechanisms in a sanctions' environment relies on cross-border intermediary practices. Narrowing access regimes and strengthening controls on diplomats' movement increases the cost of sustaining such practices and raises the risk of detection. Consequently, the political logic of this block is to make the sanctions regime more "closed": to reduce opportunities for circumvention through travel, diplomatic channels, private contacts, and physical presence in the European space. Analytically, this means that visa and diplomatic restrictions should be assessed as a factor increasing the integrity of the sanctions' architecture. Their effectiveness manifests not only in isolation, but also in improving the effectiveness of other measures that might otherwise be bypassed through offline operationality. In this way, visa measures function as an "infrastructural enhancer" of the sanctions system.

Finally, within the applied framework of the present document, the objectives and political logic of visa and diplomatic restrictions in relation to the Russian Federation may be summarised as a combination of the following functions: (1) political-normative marking and refusal of normalisation, (2) selective tightening of access regimes and cost increases, (3) strengthening of security and counter-intelligence control, (4) support for anti-circumvention by limiting physical operationality, (5) coalition signalling and standardisation of practice, managed proportionality and exceptions, and (6) complementarity and reinforcement of cumulative sanctions effect.

2.2.2.3 Advantages

Visa and diplomatic restrictions in relation to the Russian Federation have a number of advantages as instruments of political pressure and risk management, because they operate on the access and mobility regime—i.e., on the infrastructural basis of international interaction. Unlike certain economic measures, which require complex sectoral calibration and may generate significant collateral effects for markets and Member States, the visa–diplomatic track allows restrictions to be introduced that are relatively more manageable in scale and more readily communicable in politico-normative terms. Its strength, moreover, lies not only in formal prohibitions, but in reshaping the underlying "architecture of admission" into the European space and increasing the sensitivity of control systems to risks of circumvention, hostile activity, and misuse. Consequently, the advantages of this block are expressed primarily in its capacity to perform political, institutional, and security functions simultaneously. This makes visa and diplomatic restrictions an important complement to listings and sectoral sanctions, especially in the context of a prolonged conflict, where the pressure regime must remain durable without continuous expansion of the costliest economic measures.

The first advantage is high politico-normative clarity and the symbolic-institutional effect of "refusal of normalisation". Full suspension of the visa facilitation agreement and the shift to the general rules of the Visa Code send a clear signal: European space is not treated as a zone of "ordinary" interaction with a state waging a war and regarded as undermining the foundations of European security. The measure is publicly legible and institutionally tangible, as it affects one of the most visible forms of international "privilege"—facilitated access to the Schengen area. For coalition policy, this matters because it establishes a durable framework in which political interaction and contacts cannot proceed under the previous regime without changes in baseline conditions. Consequently, visa restrictions reinforce the delegitimising contour of sanctions policy, complementing economic restrictions that are often perceived as more technocratic. Analytically, this means that visa measures have high effectiveness as an instrument of political marking and maintenance of the normative narrative of the sanctions' regime. In this way, they function as an effective element of the EU's "sanctions language", converting a foreign-policy position into an institutionally fixed rule.

The second advantage is the infrastructural character of their impact. Visa policy affects not a single sector or group of companies, but the basic ability to be physically present and move within the European space. This means that the effect of visa restrictions is widely distributed and operates as an entry "filter": it reduces the convenience and predictability of using the EU as a space for business operations, political communication, organisational intermediation, and other activities, including potentially sanctions-relevant ones. In conditions where certain sanctions-evasion schemes rely on cross-border contacts, personal travel, documentation, and relationship-building, stricter visa controls increase costs and complicate the logistics of such activity. Consequently, the advantage of visa measures is that they strengthen the overall integrity of the sanctions regime by creating an additional barrier to circumvention practices. At the same time, they do not require the same depth of sectoral detail as export controls and can be adapted within the existing framework of visa legislation and consular practice. Analytically, this makes visa restrictions a convenient instrument for increasing the "closure" of the sanctions' architecture.

The third advantage is a strong security effect, particularly within the diplomatic contour. Strengthened controls over the movement of Russian diplomats within the EU, introduced through later sanctions packages, demonstrate that diplomatic restrictions are used not only as political pressure, but also as a risk-management measure linked to "hostile intelligence activities" and hybrid activity. This advantage is important for two reasons. First, it moves the diplomatic contour into the sphere of practical operational security, increasing observability of movements and reducing freedom of manoeuvre. Secondly, it strengthens coordination among Member States by establishing common notification/authorisation procedures, thereby reducing fragmentation of control and lowering the likelihood that "weak links" within the Schengen area can be exploited. Consequently, diplomatic restrictions have the advantage of strong functional justification: they address a specific risk, rather than

merely producing a symbolic signal. For critical assessment of effectiveness, this is fundamental, because it allows the block to be evaluated not in rhetorical categories, but by reference to reduced operational capabilities and improved control discipline.

The fourth advantage is compatibility with the principle of proportionality and manageable exceptions. Visa measures, unlike certain economic sanctions, allow comparatively flexible calibration through applicant categories, exceptions, consular processing priorities, and individual checks. This enables the sanctions coalition to strengthen control while avoiding direct penalisation of humanitarian-vulnerable categories, provided appropriate exceptions and procedures exist. For the EU, this matters in terms of legal robustness and political legitimacy: the visa regime must be both strict and legally manageable. Consequently, one advantage of visa restrictions is the possibility of more precise risk-based calibration, rather than a purely citizenship-based approach. Analytically, this increases the measure's sustainability in a democratic environment and reduces the likelihood of reputational costs for the sanctions' coalition. At the same time, manageable exceptions allow humanitarian channels to be preserved without undermining the overall logic of access restriction. In this way, the visa block can support sanctions effectiveness without excessive political damage to the coalition itself.

The fifth advantage is high applicability as an instrument of coalition governance and practice harmonisation. Decisions suspending the visa facilitation agreement and subsequent calibration of rules (including multiple-entry visas) create a common framework that helps reduce heterogeneity of national approaches. In the EU's multi-level system, this matters because visa policy combines EU-wide rules with a substantial level of national administration. Clear legal acts and implementing decisions enable the coalition to maintain a more unified admission regime, reducing the risk that individual Member States may de facto offset the common line through overly liberal visa-issuance practice. Consequently, visa measures increase the manageability of the sanctions architecture as a system. Analytically, this means that the effectiveness of the visa–diplomatic block should also be assessed by its capacity to reduce intra-EU divergences and sustain regime reproducibility. In this way, visa restrictions operate not only as an external instrument of pressure, but also as a mechanism of internal institutional discipline.

The sixth advantage is a lower risk of major macroeconomic collateral effects compared with sectoral sanctions, while preserving political significance. Visa restrictions do not, as a rule, generate systemic shocks for energy markets, supply chains, or financial stability of Member States, which makes them more politically manageable in a prolonged sanctions cycle. This does not imply an absence of collateral effects altogether (humanitarian, educational, and family consequences exist), but in macroeconomic terms this instrument is usually less costly for the coalition than large-scale trade and technology prohibitions. Consequently, visa and diplomatic measures can be used as a channel for maintaining sanctions dynamism and pressure under constraints on further sectoral escalation. Analytically, this makes them an important element of the resilience of the sanctions' regime: they allow continuation of pressure to be demonstrated without immediately increasing economic costs for the EU. In this way, visa measures strengthen the coalition's capacity to sustain a sanctions strategy over a multi-year horizon.

The seventh advantage is complementarity with listings and sectoral measures through restriction of physical operationality. Individual sanctions and sectoral prohibitions create legal constraints, yet part of sanctions-relevant activity may rely on physical presence and mobility (negotiations, intermediation, asset management, supply organisation, contact with service providers). Tightening the visa regime and diplomatic controls reduces the convenience of such practices and increases their risk profile. Consequently, visa and diplomatic restrictions can strengthen the operation of other sanctions even where they do not themselves generate direct economic harm comparable to trade prohibitions. Analytically, this means that the visa block should be assessed as a "force multiplier" of the sanctions' architecture: it makes other measures harder to circumvent and reduces the availability of offline circumvention tools. In this way, visa restrictions increase the overall cumulative effectiveness of the sanctions' regime.

Finally, the advantages of visa and diplomatic restrictions in relation to the Russian Federation may be summarised as (1) a combination of political-normative clarity, (2) infrastructural impact on access and mobility, (3) a strong security effect (especially in the diplomatic contour), (4) high manageability through proportionality and exceptions, (5) coalition applicability and harmonisation of practice, (6) comparatively low macroeconomic costs, and (7) complementarity reinforcing other sanctions measures.

2.2.2.4 Limitations and Implementation Problems

Notwithstanding the substantial advantages of visa and diplomatic restrictions as instruments of pressure and risk management, their actual effectiveness in relation to the Russian Federation in 2022–2025 encounters a set of persistent constraints. These constraints are partly structural (the limited autonomous coercive potential of visa measures), partly institutional (fragmented implementation across Member States and dependence on consular and border practice), and partly politico-legal (proportionality, exceptions, judicial resilience, and reputational robustness). For critical assessment, it is important to recognise that, by its nature, the visa–diplomatic block is not a "strike on resources" in the same sense as financial and technological sanctions; it operates through access and mobility regimes, and therefore its effects are more likely to manifest in medium-term and infrastructural shifts than in immediate political change. Consequently, the constraints of this block should be analysed as limits inherent to a specific instrument, rather than as evidence of the failure of sanctions policy as a whole. This framing is necessary in order to assess accurately where visa measures genuinely reinforce the sanctions regime and where their effect is objectively bounded and must be complemented by other instruments.

The first limitation is the limited direct coercive effect on strategic state behaviour. Tightening visa regimes and diplomatic procedures can reduce convenience and scope for international contacts, but it rarely has the capacity, on its own, to change key decisions of political leadership, particularly under conditions of war and mobilisation governance. In relation to the Russian Federation, this boundary is especially visible: state policy and military decisions are largely independent of the degree of comfort associated with travel or consular arrangements for citizens. Consequently, assessing visa measures by a "coerced / not coerced" criterion inevitably produces inflated expectations and methodologically weak conclusions. Their real function is to restrict normalisation, reduce mobility of certain categories, and increase operational risks—not to serve as autonomous strategic coercion. This means that visa measures are effective primarily as part of a cumulative pressure architecture rather than as a standalone instrument of behavioural reversal. Thus, the first limitation is conceptual: it arises from the nature of the measure and requires correct calibration of effectiveness criteria.

The second limitation is fragmented implementation across Member States and heterogeneity of consular practice. Even where common rules apply (the Visa Code) and the "facilitation" regime has been formally suspended, actual visa-issuance practice depends on administrative resources, national priorities, risk assessments, and the practice of individual consulates. Within the Schengen system, differences in national approaches may create an "access gradient", whereby applicants seek more favourable application windows rather than encountering a uniform regime. This is particularly critical for effectiveness assessment: a measure may be politically announced as unified, yet operate with varying intensity in practice. For the EU, this is not merely a technical issue, but a structural vulnerability of sanctions governance: where admission regimes are heterogeneous, predictability and deterrent effect are reduced. Consequently, one of the key implementation challenges remains the EU's capacity to sustain practice harmonisation while preserving a substantial degree of national administration. Analytically, this requires attention not only to the normative act, but also to actual implementation metrics (issuance dynamics, refusal rates, the structure of multiple-entry visas), as well as institutional variation within the EU. Thus, the implementation problem lies in an "implementation gap": the divergence between normative framework and administrative practice.

The third limitation is the existence of lawful exceptions and "grey zones" that are unavoidable for legal robustness, but may be exploited for circumvention. Visa policy cannot be fully "closed" without risking violations of humanitarian obligations and proportionality principles; grounds for exceptions exist (family circumstances, humanitarian reasons, education, medical travel), as do various residence-related documents not reducible to short-stay visas. These exceptions are necessary, yet they create potential channels for misuse and for bypassing the overall regime. Consequently, part of the limitation of visa measures lies in the persistent balancing requirement: the broader the exceptions, the weaker the restrictive effect; the narrower the exceptions, the higher the legal and reputational risks for the EU. For sanctions policy against the Russian Federation, this is particularly sensitive because visa measures affect broad categories of citizens and inevitably become the subject of political and human-rights debate. Analytically, this means that the effectiveness of visa measures depends not only on stringency, but also on the quality of exception management: clarity of criteria, verifiability of grounds, and the capacity to prevent exceptions from becoming a systemic loophole. Thus, legal manageability is simultaneously a condition of legitimacy and a source of bounded effectiveness.

The fourth limitation is the substitutability of visa restrictions through alternative channels of mobility and presence. Even where short-stay visas are tightened, other access routes may remain: national visas of individual states (within their competences), residence permits, family-member status, professional and educational grounds, as well as routing through third countries and the use of non-European transit hubs. In addition, a significant share of international interaction can be shifted to remote formats, reducing the "price" of restricting physical mobility. For the Russian Federation, this means that visa measures increase costs but do not always block access as such. Consequently, sanctions effectiveness of the visa regime is constrained by the availability of substitute channels and by behavioural adaptation. Analytically, this requires that visa measures be treated as a factor increasing transaction costs and risk, rather than as a mechanism of complete cessation of mobility. Thus, the effectiveness of visa restrictions is probabilistic and depends on the extent to which substitutive channels are closed and on the degree of coordination among Member States.

The fifth limitation is the high political sensitivity of visa measures and the risk of counterproductive effects. Visa restrictions affect not only elites and functional actors, but also broad categories of citizens, which creates a risk that the measure is interpreted as collective punishment. This may generate negative consequences for public diplomacy, influence on societal attitudes, and the EU's reputation as a legal and humanitarian-oriented actor. Under conditions of prolonged conflict, such effects can be exploited by Russian propaganda as evidence of "Europe's hostility", reinforcing mobilisation narratives inside the Russian Federation. Consequently, the implementation challenge of visa measures includes the need for continuous communications calibration and maintenance of regime legitimacy through clear explanation of objectives, proportionality, and the existence of exceptions. Analytically, this means that visa measures carry higher reputational risk than many sectoral sanctions, and their effectiveness partly depends on the coalition's capacity to manage that risk. Thus, the visa block is an instrument with a high political "cost" in the public domain, which constrains the space for further tightening without additional compensatory mechanisms.

The sixth limitation is the difficulty of measuring effectiveness and the attribution problem. Because visa and diplomatic restrictions operate alongside economic sanctions, military developments, and broader political dynamics, it is difficult to establish a direct causal link between visa decisions and changes in the behaviour of the target state. Moreover, even at the level of intermediate effects (reduced travel volumes, route changes, higher refusal rates), the data may be heterogeneous and not fully comparable across Member States. Consequently, effectiveness assessment requires a combination of quantitative and qualitative indicators: visa issuance dynamics, refusal rates, the structure of multiple-entry visas, changes in diplomatic activity, and contextual data on circumvention attempts and adaptation. Analytically, this means that visa measures rarely provide an "obvious" result metric; their effect manifests as altered control regimes and higher barriers, which are harder both to communicate and to

evaluate methodologically. Thus, measurement constraints reduce the coalition's ability to demonstrate the effectiveness of this instrument, especially in the public domain.

The seventh limitation is the uneven impact across categories of Russian actors. Visa restrictions are more consequential for those dependent on regular travel and international contacts, but less consequential for actors whose activity and resources are concentrated within the Russian Federation or in alternative jurisdictions. As a result, visa measures may create meaningful barriers for parts of the business and professional environment while having limited influence on key decision-making centres and security structures. Consequently, the effectiveness of visa measures in terms of pressure on "power nodes" is limited. This requires correct prioritisation: visa measures function better as an instrument of restricting normalisation and managing risks than as a primary coercive mechanism. Analytically, this means the need to distinguish target groups and to avoid projecting expectations from visa measures onto categories of actors for whom mobility is not a critical resource. Thus, uneven impact is a systemic characteristic of this instrument.

The eighth limitation is the resource burden on consular and border systems and the risk of bureaucratic overload. Returning to the general visa regime and strengthening applicant screening increases administrative workloads: more time is required for processing, more checks are needed, and more security coordination is demanded. This can generate delays, queues, reduced quality of processing, and potentially a higher rate of errors. For the EU, this matters because administrative overload can itself reduce regime effectiveness: instead of targeted filtering, bureaucratic noise may increase. Consequently, one practical constraint is the need for adequate resourcing of the visa track; otherwise, the regime becomes either overly formalistic (without effective verification) or overly slow and politically contentious. Analytically, this means that the effectiveness of visa restrictions depends on administrative capacity and digital control infrastructure. Thus, implementation of the visa block is subject to capacity constraints that cannot be resolved through political decisions alone.

Finally, taken together, the limitations and implementation problems of visa and diplomatic restrictions against the Russian Federation may be summarised as follows: (1) limited direct coercive effect, (2) implementation gap and heterogeneous practice across the EU, (3) inevitable exceptions and the risk of grey zones, (4) substitutability through alternative channels, (5) high political and reputational sensitivity, (6) difficulty of measurement and attribution, (7) uneven impact across actor categories, and (8) administrative burden and capacity constraints.

2.2.2.5 Prospects of Effectiveness (2026–2027)

The prospects for the effectiveness of visa and diplomatic restrictions in relation to the Russian Federation in 2026–2027 should be assessed as conditionally strengthen-able, i.e., dependent on the quality of access-regime management, coordination among Member States, and the integration of the visa contour into broader sanctions governance. Over the 2026–2027 horizon, visa measures are not an instrument capable, on their own, of producing a strategic political reversal; their contribution is more realistically understood as increasing the overall density of the sanctions architecture by narrowing spaces for normalisation, raising control discipline, and reducing the opportunities for the physical operationality of sanctions-relevant networks. Consequently, the question of prospects is not one of simple tightening of rules, but of whether the EU can move from the normative level already achieved to a more resilient and purpose-driven implementation practice. In this sense, 2026–2027 is a period in which the value of the visa–diplomatic block will be determined primarily by quality of execution and coalition reproducibility, rather than by the number of new formal acts. This framing is particularly important because the potential for "extensive" tightening of visa measures is constrained by political sensitivity and the need to preserve humanitarian exceptions. Therefore, improvements in effectiveness will largely depend on operational refinement.

The first forward-looking conclusion is that the politico-normative function of refusing normalisation is likely to be maintained and institutionally reinforced. Provided the war continues and baseline conditions remain unchanged, the sanctions coalition will have an interest in sustaining a regime in

which access to European space is not perceived as a previous privilege. Consequently, the decisions already taken on full suspension of visa facilitation and stricter visa-issuance practice are likely to remain a key symbolic-institutional marker of sanctions durability. In 2026–2027, the most probable trajectory is not a return to a facilitated model, but consolidation of practice around the general visa regime and further calibration of multiple-entry visas. This means that visa measures will retain high utility for sanctions signalling and for sustaining the coalition narrative. Analytically, this effect is important because it provides a "long" political framework for sanctions: normalisation becomes impossible without a change in context. Consequently, from the perspective of political pressure, this dimension of visa measures has stable prospects.

The second forward-looking conclusion is that the most substantial increase in effectiveness in 2026–2027 is likely to come from reducing fragmentation and the "implementation gap" among Member States. Since one of the main constraints on effectiveness is heterogeneity in consular practice, the prospects of the visa block depend heavily on the EU's ability to strengthen harmonisation: common criteria for risk-based scrutiny, common approaches to multiple-entry visas, more coordinated practice for applicant categories and exceptions. Implementing instruments of the Commission, common guidance, data-sharing, and harmonised verification procedures can play an important role. If this component is strengthened, visa restrictions become more predictable and therefore more deterrent. If it is not strengthened, the "access gradient" persists, and part of the pressure is neutralised by applicants searching for less stringent administrative windows. Consequently, in 2026–2027, the principal condition for growth in effectiveness is institutional strengthening of a common implementation regime rather than merely normative tightening. This makes the visa block dependent on the quality of inter-state coordination, which should be explicitly reflected in the forward-looking assessment.

The third forward-looking conclusion is that the effectiveness of visa measures will increase if they are more clearly embedded within the anti-circumvention ecosystem. The visa regime does not, on its own, block financial and trade circumvention schemes, but it can reduce their physical operationality: complicating contact-building, organisation of intermediation, asset management, and logistics within EU territory. In 2026–2027, effectiveness could be enhanced through stronger linkage between consular/border data and sanctions registers, and through more active use of risk indicators associated with circumvention (e.g., affiliation with already-sanctioned networks, roles in supply chains, and intermediary functions). This does not imply a move towards "mass denial". It implies improved precision of filtering and greater regime resilience. Consequently, the visa block becomes more effective not as a broad ban, but as an infrastructural compliance instrument. Analytically, this is particularly important because it shifts the narrative from "border closure" to controlled security and risk management, which increases legitimacy and reduces reputational costs.

The fourth forward-looking conclusion is that the diplomatic contour has a high potential for strengthening in 2026–2027, while remaining politically and legally sensitive. Controls over the movement of Russian diplomats within the EU are an area where effects are comparatively more observable: they increase observability, reduce freedom of manoeuvre, and reinforce inter-state discipline. Provided hybrid threats and intelligence risks persist, this contour could be strengthened through more detailed notification procedures, enhanced data exchange, linkage to risk profiles, and increased consistency among Member States. However, such measures inevitably confront the constraints of diplomatic law and reciprocity, as well as the risk of retaliatory restrictions by the Russian Federation. Consequently, prospects for strengthening depend on cautious but consistent institutionalisation of control, rather than abrupt public steps. Analytically, this means that diplomatic restrictions are likely to be strengthened primarily through procedures and coordination rather than high-profile declarations. This makes them potentially effective in reducing operational risks, provided governance quality is high.

The fifth forward-looking conclusion is that prospects for effectiveness will depend on the capacity to manage exceptions and humanitarian channels without allowing them to become loopholes. In 2026–

2027, as the conflict persists, pressure on the exceptions system may increase: on the one hand from human-rights and humanitarian arguments, and on the other from security and sanctions-enforcement considerations. Consequently, the coalition's task will be to maintain manageable proportionality: exceptions should remain real and usable, but strictly verifiable and risk-limited. Improvements in effectiveness may be achieved through clearer typologisation of exceptions, improved verification of grounds, and digital data-sharing tools. Otherwise, exceptions may become systemic circumvention channels. Analytically, this means that the effectiveness of the visa block in 2026–2027 will be determined not only by strictness, but also by the quality of procedural architecture. This is especially important for preserving legitimacy and avoiding counterproductive reputational effects.

The sixth forward-looking conclusion is that administrative and digital capacity is likely to become more important. If the visa regime becomes more risk-oriented and more integrated with sanctions data, burdens on consulates, border authorities, and information systems increase. Consequently, improved effectiveness in 2026–2027 will depend on investment in digital solutions, interoperability of databases, speed of information exchange, and staff training. Without this, tightening rules may lead to bureaucratic overload, reduced quality of checks, and more errors. In turn, effectiveness declines while political costs rise. Consequently, the forward-looking section should explicitly note that visa restrictions are not only policy but also an implementation infrastructure requiring capacity-building. Analytically, this adds an important institutional criterion of prospects.

The seventh forward-looking conclusion is that, from the standpoint of effectiveness, the most realistic trajectory for 2026–2027 is to strengthen visa and diplomatic restrictions as an instrument of selective deterrence and risk management, rather than as an instrument of mass restriction. The closer measures move towards a mass ban, the higher the risk of reputational damage and political counterproductivity, the more difficult it becomes to maintain coalition durability and manageable exceptions. Consequently, an optimal strategy for increasing effectiveness is improving filtering precision, reducing implementation fragmentation, strengthening anti-circumvention linkage, and consolidating diplomatic controls. In such a model, visa measures reinforce the sanctions regime without becoming an instrument that undermines its legitimacy. This is particularly important over the 2026–2027 horizon, where sanctions policy must be sustainable rather than maximalist. Consequently, effectiveness is likely to be higher under a "targeted governance" model of visa policy than under a "total closure" model.

Finally, within the applied framework of the present document, the prospects for the effectiveness of visa and diplomatic restrictions against the Russian Federation in 2026–2027 may be summarised as follows: (1) high durability of the political-normative function of refusing normalisation; (2) a potentially high increase in effectiveness if implementation fragmentation is reduced; (3) significant potential for strengthening through anti-circumvention integration; (4) high potential of the diplomatic contour in procedural control; (5) critical dependence on manageable exceptions and humanitarian channels; (6) dependence on administrative and digital capacity; (7) and a preferred trajectory of selective, risk-oriented strengthening rather than mass bans.

2.2.2.6 Conclusion

Visa and diplomatic restrictions in relation to the Russian Federation in 2022–2025 should be classified as a structurally important, yet inherently bounded instrument of political pressure within the EU sanctions architecture. Their principal contribution lies not in direct coercion towards a strategic policy reversal, but in the institutional consolidation of a refusal of normalisation, in tightening the admission regime into European space, and in reducing operational opportunities linked to mobility, diplomatic channels, and potentially hostile activity. In this sense, the visa–diplomatic block performs foreign-policy, institutional, and security functions simultaneously and complements both listings and sectoral measures. For critical analysis, it is essential to note that the effectiveness of these measures manifests primarily in infrastructural and procedural dimensions: they increase the density of the sanctions regime, reduce "grey zones" of access, and strengthen control discipline, but they cannot be properly assessed solely by reference to immediate changes in state behaviour. Consequently, the overall

assessment should define their real functional niche while also specifying the limits of autonomous effectiveness. This framing embeds visa and diplomatic restrictions within the broader picture of sanctions governance and avoids both inflated expectations and unwarranted underestimation.

The first overall conclusion is that visa measures demonstrate high politico-normative and coalition-signalling effectiveness. Suspension of the visa facilitation agreement and the shift to the general Visa Code regime are an institutionally legible signal: access to the Schengen area ceases to be a "facilitated" element of relations and becomes a strictly regulated procedure reflecting the political assessment of Russia's conduct. This supports the durability of the sanctions narrative and reinforces the principle that the normalisation of interaction cannot proceed automatically under wartime conditions. In the coalition dimension, visa decisions also operate as a mechanism of harmonisation and discipline: they establish a common framework for Member States and reduce space for bilateral "off-package" normalisation. Consequently, in terms of political signalling and institutional withdrawal of the former trust-based regime, visa measures demonstrate durable practical value. Analytically, this confirms that visa restrictions are not a secondary element, but an important part of the political contour of the sanctions' architecture.

The second overall conclusion is that the visa–diplomatic block has a meaningful security and operational effect, particularly in the diplomatic contour, although that effect depends on the quality of coordination and implementation. Strengthened control over the movement of Russian diplomats within the EU reflects a shift towards managing risks associated with "hostile intelligence activities" and towards constraining freedom of operational manoeuvre. This advantage is especially important because the diplomatic contour is one of the few areas of sanctions policy where effects can be expressed in increased observability and procedural discipline. At the same time, since implementation depends on inter-state coordination and notification/authorisation procedures, effectiveness is directly linked to the practical consistency of Member States and information exchange. Consequently, diplomatic restrictions can be highly effective as an instrument for reducing operational risks, but their effectiveness is institutionally conditioned, rather than automatic. Analytically, this means that assessment must take account of governance quality, not merely the formal legal introduction of the measure.

The third overall conclusion is that the key constraints of visa measures are systemic: limited direct coercive potential, an implementation gap, the inevitability of exceptions, substitutability through alternative channels, high political sensitivity, and difficulty of measurement. These constraints do not negate the usefulness of the instrument, but they define its real "operating band". In relation to the Russian Federation, visa measures operate more effectively as an instrument of refusing normalisation, selectively increasing costs, and strengthening control than as a mechanism of pressure on decision-making centres. Consequently, critical assessment should focus on reducing the implementation gap (harmonisation of practice), improving the management of exceptions, strengthening digital and administrative capacity, and integrating the visa contour with anti-circumvention logic. Analytically, this means that effectiveness of visa measures can be enhanced primarily through improved implementation rather than through unilateral tightening without supporting infrastructure. In this way, the visa block is an instrument whose effectiveness is highly sensitive to administrative execution quality and coalition discipline.

The fourth overall conclusion is that the most realistic vector for increasing effectiveness in 2026–2027 is selective, risk-oriented strengthening of visa–diplomatic restrictions rather than a shift towards mass bans. Mass restrictions increase the probability of counterproductive effects (reputational risks, reinforcement of propaganda narratives about collective punishment, reduced coalition durability, and higher political costs). By contrast, targeted calibration—reducing fragmentation of practice, strengthening procedural discipline, improving linkage to sanctions data and anti-circumvention—makes it possible to increase effectiveness without undermining legitimacy. Consequently, the visa and diplomatic contour is most useful as an "infrastructural enhancer" of the sanctions' architecture, increasing its closure and reducing opportunities for the physical operationality of sanctions-relevant

networks. Analytically, this clarifies the place of visa measures within the overall system of pressure: they perform better as an element of managed governance than as a maximalist closure instrument.

Overall, visa and diplomatic restrictions should be treated as a necessary component of the political sanctions block of the EU regime against the Russian Federation, with high utility for refusing normalisation, signalling, and managing security risks, but limited autonomous capacity to influence the state's strategic behaviour. Their effectiveness is determined by the quality of harmonisation and implementation, the manageability of exceptions, and the degree of integration with other measures of the sanctions' regime.

2.2.3. Restrictions on Information Influence and Media

2.2.3.1. Legal Instruments and Dates

EU restrictions on information influence and media in relation to the Russian Federation (2022–2025) are built on a hybrid legal architecture combining: (1) CFSP decisions establishing the political framework; (2) Council regulations (directly applicable) operationalising prohibitions, primarily through amendments to Council Regulation (EU) No 833/2014; and (3) listing-based measures (asset freezes/travel bans) where individual propagandists, media managers, or influence operators are designated under the relevant restrictive measures regimes. The media track has been progressively developed from early, high-visibility broadcasting bans (RT/Sputnik) towards a broader set of restrictions addressing additional outlets, distribution chains, and circumvention patterns.

Below is a consolidated register of the key legal instruments and dates to anchor subsection 2.2.3.1. (For transparency and reproducibility, each entry is presented by legal type, date, scope, and operational effect.)

A. Core "broadcasting suspension" framework under Regulation (EU) No 833/2014 (Article 2f)

1. Council Decision (CFSP) 2022/351—initial CFSP decision enabling the broadcasting suspension (1 March 2022)

- Date of adoption: 1 March 2022
- Institution: Council of the European Union
- Type of act: Council Decision (CFSP) (amending decision)
- Function in the architecture: establishes/updates the CFSP framework corresponding to the media-related restrictive measures subsequently operationalised through the directly applicable regulation.
- Operational linkage: paired with Council Regulation (EU) 2022/350 (below), which gives direct effect within EU jurisdiction.

2. Council Regulation (EU) 2022/350—insertion of Article 2f into Regulation (EU) No 833/2014; suspension of RT and Sputnik (1 March 2022; announced 2 March 2022)

- Date of adoption: 1 March 2022 (Council Regulation date as per EUR-Lex)
- Institution: Council of the European Union
- Type of act: Council Regulation (EU) (amending Regulation 833/2014)
- Core legal effect: introduces the prohibition to broadcast and to enable, facilitate or otherwise contribute to broadcasting of content by specified outlets, implemented via Article 2f of Regulation 833/2014 (as amended).
- Initial scope: RT/Russia Today and Sputnik (as defined in the annex to the act), with suspension of relevant licences/authorisations and distribution arrangements.

Methodological note for the register: the Council's public communication (press release) is useful for the political narrative and stated rationale ("disinformation and information manipulation"), but the enforceable obligations flow from the regulation's operative provisions (Article 2f) and its annexes.

B. Extension of the Article 2f ban to additional Russia-controlled outlets (2022–2024)

3. Council Regulation (EU) 2022/879—sixth package amendment to Regulation 833/2014; extension of the broadcasting ban (3 June 2022)

- Date of adoption: 3 June 2022
- Institution: Council of the European Union
- Type of act: Council Regulation (EU) (amending Regulation 833/2014)
- Core effect: expands the media-related restrictions under Regulation 833/2014, including the extension of the Article 2f broadcasting prohibition to additional outlets beyond the initial RT/Sputnik set.

4. Implementing acts operationalising the June 2022 extension (effective from late June 2022)

- Nature of instruments: implementing measures updating the relevant annexes/outlet set under the Article 2f framework; accompanied by Official Journal notices addressed to the listed/banned outlets.
- Illustrative OJ evidence: OJ notice addressed to Rossiya RTR / RTR Planeta, Rossiya 24 / Russia 24, and TV Centre International confirms their inclusion in the Regulation 833/2014 / Decision 2014/512/CFSP framework. *(For drafting discipline, the register should record the precise implementing act number and OJ reference used for the annex update alongside this notice, to avoid conflating the "package date" with the "entry into force" of the updated outlet list.)*

5. Council Regulation (EU) 2023/427—further extension of the broadcasting suspension (25 February 2023)

- Date of adoption: 25 February 2023
- Institution: Council of the European Union
- Type of act: Council Regulation (EU) (amending Regulation 833/2014)
- Core effect: extends the Article 2f broadcasting suspension to additional channels (widely reported in the EU sanctions context as covering further RT/Sputnik variants).

6. Council measures adding further Russia-associated outlets to the broadcasting suspension (2023) — additional amendments and corresponding CFSP acts

- Nature of instruments: subsequent Council amendments to Regulation 833/2014 and paired CFSP acts (where applicable), extending the list of outlets subject to Article 2f.
- Register approach: record each amending regulation/decision with (i) date, (ii) outlet set, and (iii) OJ reference for the annex update. (This is essential for evidentiary reproducibility and later evaluation of enforcement and circumvention.)

7. Council action banning four additional Russia-associated outlets (17 May 2024)

- Date of adoption/announcement: 17 May 2024
- Institution: Council of the European Union
- Instrument type (policy level): Council decision to suspend broadcasting activities in the EU (implemented through the Regulation 833/2014 Article 2f mechanism)
- Outlets named by the Council: Voice of Europe, RIA Novosti, Izvestia, Rossiyskaya Gazeta.
- Practical implication for the register: captures the corresponding legal act(s) in the Official Journal that update the Article 2f outlet list to include these entities (and note package linkage where the Council frames it within a sanctions package context).

C. Media and influence operations addressed through listing-based restrictive measures

8. Listing of influence operators and media-linked entities (example track: "Voice of Europe" and associated actors, 2024)

- Instrument type: individual/entity listings (asset freezes and travel bans) under the relevant EU restrictive measures regimes, distinct from (but complementary to) the Article 2f broadcasting suspension.

- Illustrative basis: EU reporting on sanctions applied to Voice of Europe and associated individuals/entities in 2024 shows the parallel use of listing tools against influence-operation networks.
- Register implication: distinguish clearly between (i) broadcasting/distribution suspension (Article 2f; Regulation 833/2014) and (ii) listings (asset freeze/travel ban regimes), even when the same outlet is affected by both tracks.

2.2.3.2 Objectives and Political Logic

EU restrictions on information influence and media in relation to the Russian Federation are designed as a political, security, and governance instrument within the restrictive-measures framework, rather than as a general-purpose content regulation regime. Their core logic is to reduce the capacity of the Russian state and affiliated structures to project influence through mass communication channels inside the EU, to disrupt the operational infrastructure of information manipulation, and to deny sanctioned outlets access to EU distribution systems. The EU has consistently framed this track as a response to war-related "propaganda" and information manipulation linked to Russia's aggression against Ukraine, with measures focused on state-controlled or state-aligned outlets and influence operations. The instruments used—most visibly the Article 2f broadcasting/distribution suspension mechanism under Regulation (EU) No 833/2014—are therefore intended to function as a targeted restriction on the ability to broadcast and to be carried by EU-based or EU-directed distribution channels. In policy terms, the measures sit at the intersection of CFSP pressure and societal resilience: they aim to constrain hostile information activity while preserving a legally defensible scope and proportionality. Consequently, effectiveness should be interpreted primarily in terms of reduced reach, reduced amplification, and increased operational friction for influence channels, rather than as a direct coercive lever capable of shifting Russia's strategic decisions.

A first objective is politico-normative delegitimation of war propaganda and state-sponsored information manipulation as an element of the broader sanctions' response. By formally suspending the broadcasting activities of named outlets and prohibiting EU actors from facilitating their distribution, the EU translates a political assessment into enforceable restrictions within EU jurisdiction. This serves not only to remove a set of communication channels from the EU media environment, but also to signal that participation in, or facilitation of, certain forms of state-controlled war messaging is treated as incompatible with the EU's response posture. In this sense, the measure functions as a normative boundary-setting instrument: it delineates a category of outlets that the EU characterises as instruments of the aggressor state's information strategy. The Council's communications on the RT/Sputnik measures and later outlet additions are explicit in presenting this as a sanctions response to disinformation and propaganda linked to the war. This objective is particularly relevant for sustaining coalition coherence: a public, legally codified stance reduces ambiguity and standardises expectations across Member States and private intermediaries.

A second objective is operational denial of distribution infrastructure, i.e., reducing the availability of EU-based transmission and amplification pathways. The Article 2f design does not primarily target audiences directly; it targets the ability of outlets to operate via satellite, cable, IPTV, platforms, and related distribution arrangements within the EU or directed at EU audiences. The political logic here is infrastructural: modern influence operations depend on carriage, amplification, and monetisation chains, many of which are mediated by EU-regulated entities and EU-based providers. By imposing a prohibition on broadcasting and on facilitating broadcasting, the EU seeks to interrupt the supply chain of dissemination rather than relying solely on counter-messaging or voluntary platform governance. In governance terms, this is a pragmatic choice: infrastructure restrictions are often easier to specify, audit, and enforce than attempts to regulate content itself. The Commission's explanatory material stresses that the measures concern "broadcasting activities" and their facilitation, indicating an intention to frame the intervention as a sanctions' compliance obligation for operators rather than as a direct speech restriction. The operational objective is therefore to reduce reach by constraining carriage and distribution, not to police individual narratives item by item.

A third objective is reduction of amplification and secondary distribution, including by preventing EU actors from providing enabling services that sustain the visibility of sanctioned outlets. The legal design explicitly addresses facilitation and contribution to broadcasting, which is intended to cover a range of technical and commercial behaviours that would otherwise keep the outlets accessible and discoverable. In policy logic, this is essential because modern media influence is rarely limited to linear broadcasting; it relies on re-uploads, mirroring, platform embedding, and indirect circulation through a dense ecosystem of intermediaries. The EU's approach therefore seeks to shift the default position of EU operators from passive carriage to active non-facilitation, making continued distribution a compliance risk rather than a neutral commercial decision. This is also a coalition-management tool: it standardises a minimum baseline of refusal obligations across Member States and operators, limiting discretionary divergence. However, because the environment is technologically adaptive, the objective is best described as raising friction and reducing scale rather than achieving absolute exclusion. Accordingly, an appropriate metric of effectiveness is typically a measurable reduction in mainstream distribution, not the elimination of all access paths.

A fourth objective is societal resilience and protection of the democratic public sphere, particularly under conditions of heightened geopolitical conflict. The EU's political logic treats hostile information influence as a component of hybrid pressure that can weaken public trust, polarise societies, and erode consensus around support for Ukraine and EU policy. In that logic, restricting state-controlled war-propaganda outlets is framed as a defensive measure to protect the integrity of public communication and reduce the penetration of coordinated manipulation. This objective is not limited to wartime messaging; it also relates to broader patterns of information operations aimed at undermining EU institutions and Member State cohesion. The inclusion of additional outlets over time is consistent with a resilience logic: as the influence ecosystem changes, the sanctions architecture is adjusted to maintain relevance. The Council's 2024 decision to ban additional Russia-associated outlets explicitly frames these measures as part of countering Russia's influence operations connected to the war. Thus, the political logic ties media restrictions to a broader security posture, while still relying on the restrictive-measures legal basis rather than emergency speech regulation.

A fifth objective is anti-circumvention and adaptation management, reflecting a shift from "closing channels" to "closing the routes by which channels reappear". The iterative expansion of the banned outlet set and the reinforcement of facilitation prohibitions indicate recognition that information influence operations adapt through rebranding, mirroring, and proxy distribution. Consequently, the policy logic increasingly resembles sanctions engineering: identify the new nodes in the dissemination network and bring them within the scope of Article 2f or complementary tools. Where the broadcasting ban is paired with listing measures against influence operators and associated entities, the EU aims to address not only the outlet as a label but also the organisational infrastructure that finances, manages, and coordinates the influence activity. This is visible in the EU's public discussion around "Voice of Europe" and associated actors, where the media ban logic and the network-disruption logic converge. In practical terms, this objective requires continuous monitoring and rapid legal updates; otherwise, the compliance perimeter lags behind operational adaptation.

A sixth objective is complementarity with other sanctions tracks, particularly where information influence supports sanctions evasion, mobilisation, or legitimisation of prohibited conduct. Disinformation and propaganda can facilitate circumvention by normalising grey-market trade, advertising circumvention services, or shaping risk perceptions among intermediaries and third-country partners. The EU's media restrictions are therefore not only about audience exposure; they can also be interpreted as an attempt to weaken the informational scaffolding that sustains a broader sanctions-evasion ecosystem. In this logic, restricting media channels is part of making the overall sanctions regime more "closed" by limiting the reach of messaging that supports or coordinates hostile activity. This complementarity also matters internally: the EU can demonstrate that its sanctions regime addresses both material and informational dimensions of the conflict. It further enhances deterrence by increasing reputational and compliance risk for operators considering facilitation of sanctioned outlets.

Consequently, the political logic is cumulative: media restrictions amplify the effectiveness of other measures by reducing the informational capacity of sanctioned networks.

A seventh objective is coalition signalling and international standard-setting, both within the EU and vis-à-vis partners and third countries. The media track is highly visible and therefore serves as a strong indicator of political resolve and the EU's interpretation of the conflict as involving not only military and economic domains but also the information domain. By codifying restrictions in enforceable legal acts, the EU sends a signal that information influence operations are treated as sanctionable behaviour when tied to aggression and destabilisation. This can encourage alignment by partners and can also shape private-sector behaviour globally, since large platforms and service providers often operate across jurisdictions and may internalise EU requirements as part of global compliance standards. At the same time, because media restrictions intersect with sensitive questions of freedom of expression, the EU's political logic is to maintain a legal framing that emphasises state control and war propaganda, thereby supporting proportionality and defensibility. The Commission's explanatory materials and the Council's communications typically stress the state-controlled character of the outlets and the war context, which supports this standard-setting intent. Thus, signalling is both outward-facing (to Russia and third countries) and inward-facing (to Member States and EU operators), reinforcing a unified governance posture.

Finally, the objectives and political logic of EU media restrictions can be summarised as: (1) delegitimation of war propaganda and information manipulation; (2) denial of distribution infrastructure; (3) reduction of amplification; (4) strengthening societal resilience; (5) anti-circumvention and network disruption; (6) complementarity with the broader sanctions' regime; and (7) coalition signalling/standard-setting. These objectives imply a specific evaluative frame: the measures should primarily be judged by the degree to which they reduce reach and operational capacity within the EU information environment, and by how effectively they are integrated with compliance and anti-circumvention practice. They should not be judged solely by whether they produce immediate strategic change in Russia's state behaviour, which is not the instrument's plausible autonomous mechanism.

2.2.3.3 Advantages

EU restrictions on information influence and media have a distinct set of advantages as a sanctions instrument because they operate through high-leverage distribution infrastructure and can therefore produce measurable effects on reach and amplification without relying solely on long, indirect economic transmission channels. In the EU sanctions architecture against the Russian Federation, this block has also proven highly adaptive: it began with a narrow set of high-profile state outlets and then expanded to additional Russia-associated media and influence vehicles as the conflict evolved. The instrument is particularly valuable in a long-duration conflict because it supports the sanctions regime's political narrative, limits the operational space for hostile information activity within the EU, and increases compliance costs for intermediaries that would otherwise continue to carry or amplify sanctioned content. While media restrictions are not a substitute for economic and financial measures, they function as an infrastructural force multiplier: by curtailing propaganda distribution and related influence operations, they reduce the informational capacity that sustains mobilisation, legitimisation, and parts of the circumvention ecosystem. In that sense, the advantages of this block should be assessed not only as "communication effects", but as operational and governance effects realised through enforceable prohibitions.

The first advantage is high politico-normative clarity. By identifying specific outlets as subject to broadcasting suspension and by prohibiting EU actors from facilitating their distribution, the EU converts political assessment into explicit legal obligations. This clarity matters for sanctions governance: it reduces interpretative ambiguity for operators and Member States, standardises compliance expectations, and anchors the EU's position in a form that is both public and enforceable. It also strengthens coalition cohesion by providing a common baseline for what is considered unacceptable information influence activity in the EU context. Because the measures are framed within the CFSP

restrictive-measures logic—targeting state-controlled or state-aligned war propaganda—the EU can maintain a defensible narrative of proportionality and purpose. In practice, this clarity also has a reputational effect: it publicly delineates a boundary between legitimate media pluralism and state-directed war messaging treated as part of hostile activity. As a result, the media track provides a coherent "sanctions language" for the information domain and supports continuity across packages.

The second advantage is infrastructural leverage and speed of effect. A distribution suspension under Article 2f works by removing or constraining access to carriage, transmission, and platform pathways. When implemented effectively, it can reduce mainstream reach rapidly—often more quickly than sectoral sanctions, which require time to propagate through supply chains and financial constraints. This is especially relevant in an acute phase of conflict, when the EU seeks to reduce the immediate visibility of war propaganda and disinformation inside its information space. The measure's infrastructural character also means it can be more easily translated into operational rules for carriers and platforms than attempts to regulate content on a case-by-case basis. In other words, it replaces continuous editorial judgements with a compliance obligation not to distribute specified outlets, which is typically simpler to audit. Consequently, the EU can achieve a relatively high "reach reduction per unit of legal complexity" compared with more granular content governance approaches.

The third advantage is governance efficiency through intermediary obligations. The legal design targets not only the outlets, but also the ecosystem of facilitators—operators, carriers, platforms, and service providers—by prohibiting enabling or facilitating broadcasting. This creates a compliance-driven cascade: once the obligation is in place, private intermediaries internalise it as a risk and adjust distribution practices accordingly. For sanctions governance, this is powerful because enforcement does not rely solely on state monitoring of content; it is partly delegated to private compliance functions, which are often faster and more scalable. This also reduces the reliance on constant public enforcement actions: the compliance system itself becomes a stabiliser of the restriction. Furthermore, by standardising intermediary obligations across the EU, the regime reduces the likelihood that distribution simply shifts to a less strict Member State. This contributes to the integrity of the EU information space as a regulatory unit and increases the overall density of the restriction.

The fourth advantage is direct contribution to societal resilience. Restricting state-controlled propaganda outlets reduces the volume and legitimacy of coordinated war messaging circulating in mainstream EU channels. Even where audiences can still access content through technical workarounds, the measures can reduce algorithmic amplification, reduce incidental exposure, and limit the ability of state-linked outlets to normalise or mainstream particular narratives. In policy terms, this supports democratic resilience by limiting an organised external actor's ability to exploit the openness of the EU media environment during a period of security crisis. Importantly, because the measures are framed as restrictions on specific state-linked outlets rather than broad speech controls, the EU can align this resilience objective with a more targeted legal posture. The advantage here is therefore not only reduced reach, but also reduced "institutional legitimacy" of the outlet in the EU information ecosystem: the outlet is no longer treated as a normal market participant in broadcasting and distribution.

The fifth advantage is anti-circumvention learning and scalability. The iterative expansion of the banned outlet list indicates that the EU can adapt the scope of the measure as new influence vehicles emerge or as existing outlets rebrand and migrate. In sanctions engineering terms, this is a benefit: the tool is not frozen at the initial list but can be extended to maintain relevance. Where the EU combines the broadcasting suspension with listing measures against influence operators or affiliated entities, the instrument becomes more network-oriented, addressing not only labels but also organisational infrastructure. This improves the probability of durable effect by raising the costs of adaptation and by reducing the number of viable substitution pathways. In practical terms, the EU can progressively move from a narrow "channel closure" approach to a broader "distribution and support chain" disruption approach, increasing effectiveness over time.

The sixth advantage is complementarity with other sanctions and enforcement tracks. Media restrictions can reinforce financial, trade, and anti-circumvention measures by weakening the informational scaffolding that facilitates evasion and legitimisation. They can reduce advertising and reputational opportunities for sanctioned networks, complicate recruitment and coordination, and reduce the capacity to shape narratives that encourage compliance avoidance or social acceptance of sanctions evasion. This complementarity is particularly relevant where sanctions enforcement depends on social and institutional behaviour: if hostile media influence reduces trust in sanctions or promotes workarounds, weakening that influence can indirectly improve compliance and reduce leakage. In this sense, the media block contributes to the closure and coherence of the overall sanctions' regime, even though it does not directly remove financial resources in the manner of asset freezes or export bans.

The seventh advantage is strong signalling and international standard-setting potential. Because media restrictions are visible and politically salient, they demonstrate that the EU treats information influence as a sanction-relevant domain in the context of aggression and destabilisation. This can encourage alignment by partners and shape behaviour of global platforms and service providers, which often operationalise compliance globally to simplify risk management. The EU's approach also sets a precedent for treating state-controlled war propaganda outlets as part of hostile activity, rather than as ordinary media actors. In coalition terms, this strengthens the perception of a comprehensive response encompassing military, economic, and informational dimensions. The advantage is therefore both external (signalling to Russia and third countries) and internal (reinforcing the EU's narrative of resilience and legality).

Finally, the advantages of EU media restrictions in relation to the Russian Federation can be summarised as: (1) political-normative clarity; (2) infrastructural leverage and rapid reach reduction; (3) governance efficiency via intermediary compliance obligations; (4) direct contribution to societal resilience; (5) adaptability and scalability in anti-circumvention terms; (6) complementarity with other sanctions; and (7) strong signalling/standard-setting capacity.

2.2.3.4 Limitations and Implementation Problems

Notwithstanding the operational and governance advantages of EU restrictions on information influence and media, their real-world effectiveness is constrained by a set of persistent limitations that are structural, technical, legal, and political in nature. In contrast to financial or trade sanctions, which primarily operate through material constraints on resources and transactions, media restrictions operate through information distribution systems, which are intrinsically adaptive and comparatively easy to reroute. As a result, the relevant benchmark is rarely "complete exclusion", but rather sustained reduction of mainstream reach and amplification, together with increased costs of circumvention. For a critical assessment, it is therefore essential to treat the limitations of this block as design and implementation constraints that shape the measure's effective operating range, rather than as proof of its irrelevance. In the Russian case, the problem-space is amplified by the scale and sophistication of state-aligned information operations and by the transnational nature of digital distribution. Consequently, this subsection identifies the main constraints that reduce the marginal returns of media restrictions unless they are continuously recalibrated and integrated with anti-circumvention governance.

The first limitation is technical circumvention and rapid adaptation. Broadcasting suspension measures can be bypassed through mirrors, rebranding, proxy channels, domain migration, VPN use, and migration to platforms and hosting outside EU reach. Even where linear broadcasting and EU-based carriage are constrained, content can reappear through social media reposts, messaging channels, and alternative streaming infrastructures. This is a structural feature of the information domain: distribution can be replicated at low marginal cost, and audiences can be redirected via links and new accounts. Consequently, the measure is most effective against mainstream, regulated distribution, but less effective against decentralised re-distribution. In practice, this means that the immediate drop in visibility after a ban may be partially offset over time by adaptation, unless the EU continuously updates

the scope of outlets and addresses facilitation routes. Therefore, the principal operational constraint is not that bans “do not work”, but that they have a high decay rate unless accompanied by active anti-circumvention maintenance.

The second limitation is fragmentation of implementation and uneven responsiveness among intermediaries. The Article 2f mechanism relies heavily on the compliance behaviour of carriers, platforms, and service providers. In practice, implementation speed and completeness can vary across Member States and across private operators, depending on legal interpretation, operational capacity, commercial incentives, and risk tolerance. Differences in national enforcement intensity and in platform response can create uneven application, with content remaining accessible through particular providers or jurisdictions for longer. This weakens the deterrent effect and encourages circumvention strategies that exploit “soft spots” in the enforcement landscape. Moreover, the rapid pace of digital distribution means that even short delays in takedown or de-platforming can preserve significant reach during high-attention moments. Consequently, a key implementation problem is the alignment of operator compliance with the EU’s intended tempo and coverage of restrictions.

The third limitation concerns legal constraints and proportionality challenges, particularly in relation to freedom of expression and information. Although the EU frames the measures as targeted restrictions on state-controlled propaganda outlets linked to war and destabilisation, the measures still operate in a sensitive domain and must remain legally defensible. This creates a structural tension: a broader scope increases operational effect but increases legal and reputational risk; a narrower scope strengthens legal defensibility but may leave significant influence capacity intact. In addition, legal certainty matters: intermediaries require clear definitions of what constitutes prohibited “broadcasting” and prohibited “facilitation”, especially in a digital environment where boundaries between broadcasting, hosting, and user sharing can be blurred. If legal definitions are perceived as ambiguous, operators may under-comply (to avoid overblocking) or over-comply (to avoid risk), both of which generate governance costs. Consequently, the effectiveness of the measure is bounded by the need to maintain a legally robust, proportionate and clearly defined scope, which limits the speed and breadth with which the EU can expand the restrictions.

The fourth limitation is audience displacement and the “ecosystem shift” problem. Restricting specific outlets can lead audiences to migrate to alternative channels, including “grey” outlets, fringe platforms, or closed messaging ecosystems. This can reduce the utility of bans in terms of reducing exposure among highly motivated audiences, while potentially increasing polarisation by moving consumption into less moderated environments. In that sense, the measure may be more effective in reducing incidental exposure and mainstream amplification than in reducing consumption by core audiences. This is not a reason to abandon the measure, but it affects the expected mechanism: the realistic outcome is often a shift from mainstream distribution to peripheral distribution, rather than disappearance. Consequently, the evaluation model must distinguish between mainstream reach reduction and hard-core audience persistence, and must recognise that the measure may change the shape of the information ecosystem rather than eliminate influence.

The fifth limitation is the attribution and measurement problem. It is difficult to isolate the effect of media restrictions from other drivers of audience behaviour, including platform algorithm changes, broader wartime attention cycles, domestic policies within Russia, and other sanctions measures. Data availability is also uneven: granular metrics on reach, engagement, and monetisation are often proprietary to platforms, and cross-country comparability is limited. As a result, effectiveness assessment can become overly reliant on anecdotal evidence or on coarse proxies (e.g., whether a channel is “accessible” in a given Member State) rather than on systematic measurement. This limits the ability of the EU and analysts to demonstrate effectiveness credibly and can weaken political sustainability. Consequently, an implementation problem is the absence of a consistent measurement framework and shared indicators, which reduces learning and makes recalibration more reactive than strategic.

The sixth limitation is counterproductive narrative risk, including the potential for the measures to be framed as "censorship" and used for mobilisation and propaganda inside Russia and in some third-country information spaces. Because the measure operates in a sensitive domain, adversarial actors can reframe it as an attack on free speech and media pluralism, thereby undermining the EU's normative narrative and potentially strengthening anti-EU sentiment. This risk is particularly acute where measures are communicated without sufficient emphasis on state control, war-propaganda function, and the legal basis in restrictive measures. The counter-narrative risk does not negate the operational rationale, but it does impose a governance requirement: the EU must maintain a disciplined communications approach and clear justification to preserve legitimacy. Consequently, the measure's effectiveness is partly dependent on the coalition's ability to manage reputational and informational blowback.

The seventh limitation is limited reach beyond EU jurisdiction and the third-country problem. Even if EU distribution is constrained, Russian state media and influence operations can continue to operate globally, including in third countries and via non-EU platforms and infrastructures. Because information ecosystems are transnational, continued global dissemination can feed back into EU audiences through diaspora networks, imported content, or cross-platform circulation. This means that the EU can reduce the internal distribution infrastructure but cannot fully neutralise external influence capacity unless partners align or unless platforms apply global compliance standards. Consequently, the effectiveness of the EU's media restrictions is bounded by international coordination and by the global footprint of major platforms. In the absence of broad alignment, the measure risks pushing influence activity outward rather than eliminating it.

The eighth limitation is the risk of regulatory and enforcement overload. Maintaining an effective media restriction regime requires continuous monitoring of new outlets, mirror sites, proxies, and rebrands; rapid legal updates; and sustained enforcement coordination with private intermediaries. This can create capacity constraints and compliance fatigue, particularly as the list of restricted outlets grows. Without prioritisation and a clear typology of targets (high-impact distribution nodes versus symbolic targets), the regime may experience diminishing returns and "list inflation". Moreover, heavy reliance on private intermediaries can produce inconsistent outcomes if compliance teams treat the measure as one risk among many and prioritise other obligations. Consequently, capacity and prioritisation are structural constraints: the regime can remain effective only if it is managed as a continuously maintained system rather than as a one-off ban.

Finally, the limitations and implementation problems of EU media restrictions can be summarised as follows: (1) high circumvention and adaptation capacity; (2) fragmented implementation and uneven intermediary responsiveness; (3) legal proportionality and definitional challenges; (4) audience displacement into alternative ecosystems; (5) attribution and measurement constraints; (6) counterproductive narrative risk; (7) limited reach beyond EU jurisdiction; and capacity constraints that increase the risk of enforcement overload and diminishing returns.

2.2.3.5 Prospects of Effectiveness (2026–2027)

The prospects for the effectiveness of EU restrictions on information influence and media in 2026–2027 should be assessed as conditional and capability-dependent. By late 2025 the EU had already moved beyond an initial, high-visibility ban focused on RT/Sputnik towards a broader, iterative approach covering additional Russia-associated outlets and, in selected cases, related influence-operation networks. The central question for 2026–2027 is therefore not whether the EU "can" ban further outlets as a formal matter, but whether it can sustain a high-tempo, high-precision governance cycle that keeps the compliance perimeter aligned with a rapidly adapting information ecosystem. In practical terms, the marginal effectiveness of this block will increasingly depend on: (1) the speed and quality of anti-circumvention updates; (2) harmonised implementation by Member States and intermediaries; (3) integration with listing tools and broader sanctions enforcement; and (4) credible measurement and communication of effects. Consequently, the most realistic pathway to increased effectiveness is not

an extensive expansion of bans alone, but a shift towards a more "supply-chain" approach to distribution and monetisation disruption, with robust legal defensibility.

A first forward-looking conclusion is that the political-signalling and resilience functions will remain robust, provided the EU continues to frame these measures as targeted action against state-controlled war propaganda and coordinated information manipulation. In the context of a protracted conflict, maintaining an institutional posture that treats hostile information influence as sanction-relevant behaviour is likely to remain politically valuable. This yields a durable "refusal of normalisation" effect in the information domain, complementing the visa and diplomatic track and reinforcing the broader sanctions narrative. Even where technical circumvention persists, the public and institutional fact of restrictions continues to shape intermediary behaviour, partner alignment, and domestic expectations within Member States. Consequently, the EU's ability to maintain a stable normative rationale—state control, war propaganda function, and destabilisation purpose—will be a core determinant of coalition sustainability and legal defensibility in 2026–2027.

A second forward-looking conclusion is that operational effectiveness can increase primarily through faster anti-circumvention cycles. The largest structural weakness of media restrictions is adaptation: rebranding, mirroring, domain rotation, and migration to new distribution routes. If the EU reduces the time lag between identification of circumvention patterns and legal/operational response, the decay rate of effectiveness decreases. In practice, this means improving the pipeline from monitoring (intelligence, regulatory, and open-source) to formal updates of the restricted outlet set and related measures. A higher-tempo update model also requires better typology: prioritising high-impact distribution nodes and monetisation pathways rather than focusing mainly on symbolic targets. In 2026–2027, effectiveness is therefore likely to increase where the EU adopts a structured "iterative closure" model: rapid addition of new proxies and mirrors, combined with clear obligations for intermediaries to prevent re-appearance within defined parameters. The more the regime resembles continuous sanctions engineering, the more durable its effect.

A third conclusion is that integration with a broader "distribution and monetisation supply chain" approach will be decisive. A pure broadcasting ban reduces mainstream carriage, but modern influence operations depend on layered infrastructures: hosting, content delivery networks, platform accounts, advertising and monetisation tools, payment services, and sometimes third-country intermediaries. In 2026–2027, the EU can increase effectiveness by targeting not only the outlet label but also the supporting service ecosystem, using a combination of: (1) Article 2f restrictions; (2) services restrictions under the broader 833/2014 framework where relevant; and (3) listings against entities and individuals who coordinate influence operations. Such integration would raise the cost of sustaining a persistent influence footprint and would reduce substitution opportunities. It also has the advantage of being more compatible with compliance systems: platforms and service providers can operationalise restrictions not only as "do not carry channel X", but as "do not provide enabling services to network Y". Consequently, the prospects for increased effectiveness are stronger where the EU shifts from a channel-centric to a network-and-services-centric targeting model.

A fourth conclusion is that harmonised and timely intermediary implementation will be a critical limiter or multiplier. Because the measures are enforced largely through private carriers and platforms, the EU's practical influence depends on the consistency, speed, and completeness of intermediary compliance. In 2026–2027, greater effectiveness is more likely if the EU achieves: (1) clearer compliance guidance; (2) faster notification procedures; (3) standardised expectations across Member States; and (4) enforcement signals that reduce strategic ambiguity for intermediaries. Without such harmonisation, the regime remains vulnerable to "soft spots" and uneven take-up, which provides exploitable gaps for circumvention. The EU's capacity to coordinate Member State regulators and to engage systematically with major intermediaries therefore becomes a central determinant of operational outcomes.

A fifth conclusion concerns measurement and evidentiary credibility. In 2026–2027, the political sustainability of the media restrictions track will depend increasingly on whether the EU and the

analytical community can credibly demonstrate intermediate effects—reach reduction, reduced amplification, reduced availability on mainstream carriers, and reduced monetisation—rather than relying on binary claims that outlets are "banned". A shared metrics framework (traffic, platform availability, engagement proxies, advertising footprint, and network diffusion indicators) would improve both internal learning and external communication. It would also help prioritise targets by impact and reduce the risk of list inflation. In the absence of better metrics, the regime may be criticised as either ineffective (because content still exists via workarounds) or disproportionate (because the effect is not demonstrably linked to security objectives). Consequently, measurement capacity is a core condition for increased effectiveness, not merely an analytical add-on.

A sixth conclusion is that legal defensibility will remain a binding constraint. The more the EU expands the scope of media restrictions, the greater the need for precise framing, evidence of state control or instrumentalisation, and proportionality. In 2026–2027, effectiveness gains will be higher where the EU improves the evidentiary basis for each extension and maintains clear definitions of prohibited facilitation and distribution. This reduces litigation risk and prevents undermining of the regime through partial judicial setbacks. It also supports coalition stability by reducing political controversy within Member States. Consequently, a quality-over-quantity approach to legal justification can increase durability and therefore effectiveness over time.

A seventh conclusion is that the risk of counterproductive narrative effects will persist, but can be managed through disciplined communication and targeted design. In a contested information environment, measures will continue to be framed by adversarial actors as "censorship". In 2026–2027, the EU can reduce this risk by maintaining a clear narrative: the measures target state-controlled war propaganda channels used as instruments of aggression and destabilisation, not pluralistic journalism. Pairing restrictions with transparency about legal bases and with public evidence where possible can strengthen legitimacy. More targeted, risk-based expansion—rather than broad, ambiguous categories—also reduces reputational blowback. Consequently, the prospects of effectiveness improve where governance minimises communication vulnerabilities while preserving operational impact.

Finally, the most realistic 2026–2027 trajectory is selective strengthening through anti-circumvention engineering, rather than a simple expansion of bans in isolation. If the EU sustains fast update cycles, improves intermediary harmonisation, integrates network and services targeting, and develops credible metrics, the media restrictions block can deliver durable reductions in mainstream reach and amplification, raise the cost of influence operations, and strengthen the resilience of the EU information space. At the same time, it is not realistic to expect complete elimination of hostile content in a globally networked environment. The plausible objective is to constrain scale, legitimacy, and operational efficiency within EU jurisdiction.

2.2.3.6 Conclusion

EU restrictions on information influence and media in relation to the Russian Federation in 2022–2025 should be classified as a structurally important "infrastructural" component of the political sanctions block, operating at the intersection of restrictive measures and hybrid-security governance. Their core contribution lies not in direct strategic coercion of the Russian state, but in reducing the capacity of state-controlled or state-aligned outlets and influence operations to exploit EU distribution systems, mainstream amplification, and institutional legitimacy within the European information space. In that sense, the media track functions as a high-visibility and high-leverage instrument of sanctions governance: it codifies the EU's refusal to treat hostile war propaganda as ordinary media activity and translates this position into enforceable obligations for intermediaries. The realistic benchmark for assessing effectiveness is therefore reduced mainstream reach and amplification, increased operational friction and costs of circumvention, and strengthened resilience of the EU public sphere—rather than an expectation of immediate behavioural change by the Russian leadership. This framing is essential for a balanced critical assessment: it avoids both overclaiming and underestimating the instrument's utility.

The first overall conclusion is that the media restrictions block demonstrates high politico-normative value and coalition-signalling effectiveness. By naming outlets and prohibiting facilitation of their distribution, the EU sets a clear normative boundary and sustains a coherent public narrative that information influence is part of the aggression and destabilisation toolkit. This signal operates both externally (towards Russia and third countries) and internally (towards Member States, regulators, platforms, and carriers). It also has a governance effect: compliance obligations standardise behaviour of intermediaries, reducing discretionary divergence and supporting the integrity of the EU information space. Consequently, in the political sanctions architecture the media track performs a function similar to the visa block: it institutionalises a refusal of normalisation in a domain that is highly visible and symbolically important, thereby reinforcing coalition durability over time.

The second overall conclusion is that the media restrictions block has meaningful operational effect, but with a high adaptation-driven decay rate unless continuously maintained. The principal mechanism of impact is infrastructural denial: removal from regulated carriage and mainstream distribution. This can produce rapid reductions in availability and incidental exposure within the EU, especially when intermediaries implement promptly. However, the information environment is structurally prone to circumvention through mirrors, rebrands, proxies, and migration to alternative platforms and closed channels. Consequently, the long-term effectiveness of the block depends on continuous anti-circumvention governance: monitoring, rapid updates, prioritisation of high-impact nodes, and integration with broader enforcement tools. Without such maintenance, the regime risks “list inflation” and diminishing marginal returns, where new bans provide primarily symbolic effects but limited additional operational impact.

The third overall conclusion is that implementation quality is a decisive determinant of results. Because enforcement relies heavily on private intermediaries (carriers, platforms, hosting and distribution services) and on Member State-level implementation, uneven responsiveness and fragmentation can undermine the regime’s density. Conversely, harmonised guidance, consistent enforcement signals, and coordinated procedures can materially increase effectiveness by reducing “soft spots” and shortening response lags. This feature distinguishes media restrictions from some other sanctions instruments: their impact is less a function of formal legal adoption alone and more a function of the EU’s ability to orchestrate a high-tempo compliance ecosystem. Therefore, the measure’s effectiveness should be assessed not only by the existence of legal acts, but by the practical governance capacity to keep implementation aligned across the EU’s multi-level system.

The fourth overall conclusion is that legal defensibility and proportionality constraints are not incidental, but constitutive conditions of sustainability. Media restrictions operate in a sensitive domain and are vulnerable to “censorship” framing; accordingly, the EU’s ability to maintain legitimacy depends on a disciplined legal and communications posture that emphasises state control, war-propaganda function, and security rationale. Where this posture is robust—supported by evidence, precise definitions, and a targeted scope—the instrument is more likely to remain durable and to withstand legal and political contestation. Where scope expands without clear evidence or where obligations become ambiguous, litigation and reputational risks increase, which can weaken coalition cohesion and reduce operational compliance. Consequently, the most effective trajectory is not maximalist expansion, but selective, evidence-based extension coupled with clear compliance guidance.

The fifth overall conclusion is that, for 2026–2027, the most realistic pathway to stronger effectiveness is a shift from channel-centric bans towards network-and-supply-chain disruption. This means pairing Article 2f distribution suspensions with measures that address enabling services and organisational infrastructure, including—where warranted—listing tools against influence operators and entities, and tighter anti-circumvention cycles against rebrands and proxies. It also requires credible measurement: without shared indicators (reach, availability, engagement proxies, monetisation signals, and diffusion patterns), the regime cannot be prioritised effectively and will be vulnerable to both “ineffective” and “disproportionate” critiques. In this sense, the future effectiveness of the media track is contingent on the EU’s capacity to treat it as a managed system rather than a one-off set of bans.

Overall, the EU's restrictions on information influence and media should be treated as a necessary and high-utility component of the political sanctions block against the Russian Federation, delivering strong signalling and meaningful reductions in mainstream distribution within EU jurisdiction, but subject to clear limits due to technical circumvention, implementation fragmentation, and legal proportionality constraints. Their enduring value lies in strengthening the resilience of the EU information environment and increasing the cost and friction of hostile influence operations, thereby reinforcing the cumulative effectiveness of the broader sanctions' architecture.

2.3. Prospects for Continuing Political Sanctions (2026–2030)

2.3.1. Purpose and Scope of the 2026–2030 Outlook

This subsection defines the purpose, analytical scope, and evaluative assumptions for the 2026–2030 outlook on the continuation of EU political sanctions in relation to the Russian Federation. In the present report, "prospectiveness" is treated as conditional effectiveness over time: the extent to which political sanctions can remain operationally implementable, legally robust, coalition-manageable, and strategically useful under plausible future conditions. The focus is therefore not on a binary judgement of whether political sanctions "work" in an absolute sense, but on whether they can continue to deliver their core functions—delegitimation, institutional constraint, coalition signalling, and risk-management—at an acceptable cost and with controllable side effects. This framing is particularly important because political sanctions, unlike some sectoral economic measures, often generate their most meaningful effects through cumulative governance mechanisms rather than through immediate material shocks. Accordingly, the time horizon 2026–2030 is assessed as a multi-year policy cycle in which sustainability, enforceability, and adaptability are decisive variables. The purpose of this outlook is to establish a disciplined basis for subsequent recommendations on calibration: when continuation is valuable, when refinement is necessary, and which implementation capacities must be protected in order to preserve effectiveness.

The scope of 2.3 is limited to the political sanctions' domain, understood in the applied sense used throughout Part 2: (1) individual restrictive measures (listings), (2) visa and diplomatic restrictions, and (3) restrictions on information influence and media. These instruments are analysed as a coherent political track, even where their legal bases differ (CFSP decisions, regulations under restrictive measures, visa-law instruments, and provisions embedded in sectoral sanctions regulation). The outlook does not re-litigate the full descriptive inventory of measures already set out in 2.2; instead, it synthesises the key design and implementation findings from that inventory to determine what is likely to remain effective and what is likely to degrade over time. In practical terms, the 2026–2030 outlook is concerned with the policy "operating range" of political sanctions: where they deliver reliable value, where marginal returns diminish, and where systemic constraints—legal, institutional, or geopolitical—set hard limits on what can be achieved.

Methodologically, the outlook proceeds from three working assumptions that shape the boundaries of analysis. First, political sanctions are not treated as an autonomous mechanism capable of producing a predictable strategic reversal by the Russian state; rather, they are treated as instruments of constrained coercion with high governance utility, whose principal effects occur through delegitimation, restriction of international manoeuvrability, and the densification of the compliance environment. Secondly, the analysis assumes that the Russian state and affiliated networks will remain adaptive, and that circumvention and substitution pressures will therefore persist; effectiveness is thus interpreted as the ability to maintain pressure under adaptation, not as the elimination of hostile capacity. Thirdly, the analysis assumes that EU policy will continue to operate under constraints of legality and proportionality. Therefore, the durability of political sanctions depends as much on evidentiary quality,

defensibility, and coalition legitimacy as on the formal scope of restrictions. These assumptions are not normative preferences. They are analytical constraints derived from the structural characteristics of the instruments assessed in 2.2 and from the institutional nature of EU sanctions governance.

In terms of outputs, the 2026–2030 outlook is designed to support four downstream tasks in the report. It provides (1) a scenario-aware mapping of which political sanctions functions remain strategically relevant, (2) a set of risk conditions under which continuation becomes more or less prospectively valuable, (3) an implementation lens identifying the capacities that must be strengthened to prevent effectiveness decay, and (4) a criteria base for escalation or conditional adjustment in later sections. In other words, the outlook is not a standalone forecast; it is a policy-evaluation scaffold that enables the report to move from retrospective assessment to forward-looking calibration.

2.3.2. Strategic Functions to Be Preserved

The 2026–2030 prospectiveness of EU political sanctions depends on whether they continue to deliver a set of strategic functions that remain valuable regardless of short-term coercive outcomes. Political sanctions are most defensible and most operationally useful when they are understood as governance instruments that shape the international environment in which the Russian state and its associated networks operate, rather than as standalone levers expected to produce immediate policy reversal. The core question for this subsection is therefore which functions should be preserved as "non-negotiable outputs" of the political sanctions track, and which functions are inherently contingent on context. In the case of Russia, the persistence of the war-related security context, the scale of state capacity, and the adaptive character of circumvention networks mean that political sanctions will remain most valuable where they maintain a durable framework of delegitimation, institutional constraint, and compliance-driven friction. Preserving these functions is also essential for coalition sustainability: it provides a stable rationale for continuation even when direct behavioural change is not observed.

A first strategic function to preserve is political-normative delegitimation. Political sanctions translate a sustained assessment—war of aggression, destabilisation, and hostile information activity—into institutionalised restrictions that deny the Russian state and its key enabling actors the status of "ordinary" participants in EU-adjacent political, economic, and informational environments. Delegitimation matters because it is cumulative and durable: it reduces the scope for routine normalisation, raises the reputational and political cost of engagement for third actors, and anchors the coalition's narrative in legally enforceable acts rather than in declaratory statements alone. This function is performed across the political sanctions' toolkit: listings mark individuals and entities as sanctions-relevant actors; visa and diplomatic restrictions remove facilitated access as a privilege; media restrictions formalise the EU's refusal to treat state-controlled war propaganda as normal broadcasting activity. The utility of this function does not depend on immediate coercive outcomes; it depends on institutional consistency over time. Consequently, delegitimation is a strategic function to preserve because it underpins both internal coalition coherence and external predictability of the EU's response posture.

A second function to preserve is institutional constraint on manoeuvrability, particularly for the networks that enable decision-making, funding, influence, and circumvention. Political sanctions are often most effective where they reduce the flexibility of the Russian state and its associated actors to operate across jurisdictions, to maintain privileged access channels, and to rely on low-friction intermediaries. Listings constrain access to assets and raise compliance barriers; visa and diplomatic restrictions reduce mobility and raise procedural burdens; media restrictions constrain distribution channels and reduce the capacity for mainstream amplification. In a long-duration conflict, this function becomes strategically central because it operates through persistent friction: it increases transaction costs, lengthens operational chains, and narrows the set of viable options, even when actors adapt. The purpose is not to eliminate capacity in a single step, but to constrain the range and efficiency of options

available over time. Therefore, institutional constraint is a strategic function to preserve because it provides a durable contribution to reducing the operational space of hostile activity.

A third function to preserve is coalition signalling and internal governance cohesion. Political sanctions are among the most visible elements of the EU response and therefore play a disproportionate role in maintaining unity and credibility. They enable the EU to demonstrate continuity of pressure, to communicate clear thresholds of unacceptable behaviour, and to maintain a shared interpretative frame among Member States and partners. This signalling function is not merely rhetorical; it shapes private-sector risk behaviour and partner alignment, and it reduces incentives for unilateral deviations by creating a public baseline. Importantly, the function also operates internally: consistent political sanctions support the EU's ability to sustain more complex and sometimes more costly measures in other domains by keeping the coalition narrative coherent and by providing regular "proof of action" that is politically communicable. For 2026–2030, preserving coalition signalling matters because sanctions effectiveness is inseparable from coalition durability; without stable governance cohesion, even well-designed measures are vulnerable to erosion through uneven implementation and political fragmentation.

A fourth function to preserve is risk management and resilience in hybrid domains, especially where political sanctions protect EU internal stability rather than directly constraining Russian resources. Visa and diplomatic measures, particularly those addressing diplomatic movement controls, have a security rationale linked to hostile intelligence and hybrid activity. Media restrictions serve a resilience function by limiting the mainstream distribution and amplification of state-controlled war propaganda and coordinated manipulation. These instruments are valuable because they strengthen the EU's defensive posture while remaining within a restrictive-measures governance framework. In 2026–2030, the relevance of this function is likely to persist irrespective of the precise trajectory of the war, because hybrid activity and information influence are low-cost, scalable tools of state power and are therefore unlikely to disappear. Preserving the resilience function does not require maximalist restrictions; it requires targeted, legally robust, and operationally implementable controls that reduce exposure and raise the cost of hostile activity within EU space. Consequently, resilience and risk management are strategic functions to preserve because they protect the EU's operating environment, which is a precondition for sustaining any long-term sanctions policy.

A fifth function to preserve is anti-circumvention support and sanctions-ecosystem closure. Political sanctions, while sometimes perceived as "symbolic", can materially strengthen the effectiveness of economic and financial measures by closing physical, institutional, and informational pathways that facilitate evasion. Listings can target facilitators and intermediaries; visa regimes can reduce physical operationality and complicate on-the-ground coordination; media restrictions can disrupt the informational scaffolding that advertises or normalises circumvention and can impede the use of influence operations to reduce compliance discipline. In 2026–2030, this function will likely become more important rather than less, because the longer a sanctions regime remains in place, the more adaptive circumvention networks become and the more value attaches to closing the ancillary channels that sustain them. Preserving this function therefore requires that political sanctions are not managed in isolation, but integrated into broader enforcement strategies, including data-sharing, typology of targets, and rapid update cycles.

A sixth function to preserve is conditionality and the structuring of future adjustment pathways. Political sanctions provide an institutional framework in which the EU can define, communicate, and enforce conditionality: what behavioural changes would be required for easing, what triggers would justify tightening, and how reversibility would operate. This function is often underestimated because it does not produce immediate operational outcomes, but it matters for long-horizon governance. A sanctions regime that cannot be adjusted credibly over time risks either becoming politically brittle (if it cannot respond to change) or becoming strategically incoherent (if it continues without clear rationale). Preserving conditionality means maintaining clear legal bases, evidentiary standards, and review mechanisms so that adjustments can be made without undermining legitimacy. For 2026–2030, this is

strategically valuable because it supports both deterrence (through credible escalation capacity) and de-escalation pathways (through verifiable, reversible easing), while preventing ad hoc normalisation.

Taken together, the strategic functions to be preserved across 2026–2030 can be summarised as: (1) delegitimation, (2) institutional constraint and persistent friction, (3) coalition signalling and governance cohesion, (4) hybrid-domain resilience and risk management, (5) anti-circumvention support and sanctions-ecosystem closure, and (6) conditionality with credible adjustment pathways.

2.3.3. Scenario Frame for 2026–2030

A forward-looking assessment of the prospectiveness of political sanctions over 2026–2030 requires an explicit scenario frame, because the effectiveness and optimal calibration of political measures are highly contingent on the evolution of the war, the intensity of hybrid activity, and the political throughput capacity of the EU and its partners. Political sanctions are not a single-purpose instrument. They deliver different value under different conditions. Without a scenario frame, evaluation risks either assuming a static environment (thereby underestimating adaptation and escalation risks) or treating any change in circumstances as evidence that the instrument "failed". The scenario approach used here is deliberately pragmatic: it does not aim to forecast a single outcome, but to provide a structured basis for calibrating political sanctions under three plausible trajectories—baseline continuation, escalation, and partial de-escalation—while preserving the strategic functions identified in 2.3.2. Each scenario is defined by the likely direction of key variables: conflict intensity, hybrid pressure, coalition cohesion, and the availability of verifiable behavioural changes that could justify adjustment. The purpose is to map how the political sanctions mix should respond so that the regime remains durable, proportionate, and strategically coherent through 2030.

Scenario A: Baseline continuation (protracted conflict and persistent hybrid pressure). In the baseline scenario, the war remains unresolved, the Russian Federation continues to sustain a war economy and hostile external posture, and hybrid activity (information influence, cyber pressure, covert networks, and political interference attempts) persists at a steady, adaptive level. Coalition cohesion remains broadly intact, but political throughput is constrained by economic trade-offs, domestic political cycles, and the cumulative governance burden of long-term sanctions. Under this scenario, the prospectiveness of political sanctions depends primarily on their capacity to maintain stable delegitimation and institutional constraint while managing adaptation and avoiding list inflation. The optimal mix would emphasise: (1) network-oriented listings targeting facilitators and intermediaries; (2) durable visa and diplomatic restrictions focused on refusal of normalisation and risk-based control; and (3) media restrictions maintained through iterative anti-circumvention updates and intermediary compliance harmonisation. The central governance challenge is sustainability: preventing erosion through uneven implementation and ensuring that political sanctions continue to reinforce broader enforcement without generating disproportionate political or reputational costs. In this scenario, effectiveness is best understood as maintaining friction and reducing operational space over time rather than achieving discrete behavioural breakthroughs.

Scenario B: Escalation (renewed expansion of aggression and/or intensified hybrid operations). In the escalation scenario, the Russian Federation increases the scope or intensity of aggression (including renewed offensives, additional coercive steps, or further destabilisation), and/or intensifies hybrid activity directed at EU Member States and partners. This scenario may also include a measurable increase in circumvention networks, greater use of third-country intermediaries, and more aggressive information operations intended to fracture coalition cohesion. Under escalation, the role of political sanctions shifts: they become not only a "maintenance" tool but an escalatory signalling and resilience instrument. The optimal mix would involve faster and broader use of listings (including new categories of facilitators), tighter diplomatic controls where security risk justifies them, and accelerated media restrictions targeting both outlets and enabling networks. Importantly, escalation requires that the EU preserve legal defensibility and proportionality while increasing tempo; otherwise, political and judicial

vulnerabilities can undercut the intended signal. In this scenario, the main risk is governance overstretch: rapid expansion without evidentiary robustness, fragmented implementation, and rising reputational costs. Therefore, prospectiveness under escalation depends on the EU's capacity to run a high-tempo governance cycle—rapid updates, coordinated enforcement, and disciplined communications—while maintaining coalition unity.

Scenario C: Partial de-escalation (verifiable change enabling conditional adjustment). In the de-escalation scenario, there is a demonstrable, verifiable change in baseline conditions—such as credible cessation or reduction of hostilities, verifiable withdrawal steps, a monitored and sustained reduction of specific destabilising behaviours, or other measurable changes that could justify a conditional adjustment of political sanctions. This scenario does not imply immediate normalisation; it implies the emergence of a policy space in which sanctions can be used more explicitly as a conditionality framework. Under de-escalation, the prospectiveness of political sanctions is expressed through their ability to structure reversible easing while maintaining deterrence and the capacity for rapid re-tightening. The optimal mix would prioritise: (1) maintaining core listings against the highest-risk nodes (decision-making, war enabling, circumvention infrastructure) while introducing carefully sequenced review mechanisms for peripheral designations; (2) preserving visa and diplomatic restrictions as a baseline refusal-of-normalisation posture, with narrowly defined, verifiable adjustments rather than a return to facilitation; and (3) sustaining media restrictions against state-controlled war propaganda outlets while developing criteria-based review linked to demonstrable changes in behaviour and control structures. The principal governance challenge is credibility: easing must be conditional, evidence-based, and reversible, otherwise it risks undermining coalition trust and weakening deterrence. In this scenario, political sanctions remain prospectively valuable as a management tool for transition rather than as a static punishment.

Across all three scenarios, two cross-cutting principles shape the scenario frame. First, political sanctions remain most prospectively valuable when they are calibrated to preserve the strategic functions of delegitimation, institutional constraint, resilience, and anti-circumvention support, rather than being evaluated solely against immediate coercion. Secondly, the effectiveness of political sanctions is inseparable from implementation capacity and coalition governance: scenario shifts change the optimal tempo and scope, but do not remove the need for legal robustness, harmonised execution, and credible metrics.

2.3.4. Listings: Prospects and Calibration Priorities

From a 2026–2030 perspective, individual restrictive measures (listings) remain one of the most prospectively valuable components of the political sanctions track because they combine high political visibility with relatively high calibratability and can be updated iteratively without necessarily triggering the largest macroeconomic collateral effects associated with additional sectoral measures. Their central forward-looking value lies in their capacity to maintain targeted pressure on decision-enabling and war-enabling networks, to raise compliance friction for intermediaries, and to function as a flexible anti-circumvention instrument. At the same time, the marginal returns of listings are not automatic: after multiple waves of designations, the effectiveness of new additions increasingly depends on the quality of network targeting, evidentiary robustness, and cross-jurisdictional coordination. Consequently, the prospectiveness of listings through 2030 should be assessed as high utility with bounded coercion: listings are unlikely, by themselves, to compel strategic reversal, but they can materially constrain manoeuvrability, increase transaction costs, and disrupt enabling ecosystems if they are managed as a high-quality, continuously maintained regime rather than as a purely cumulative list.

Under the baseline continuation scenario, the primary role of listings is to sustain persistent friction and to keep the compliance environment dense for sanctions-relevant networks. The most effective listing strategy in a protracted conflict is not primarily to add ever more politically symbolic names, but to sustain a targeting logic focused on functional nodes: facilitators, intermediaries, procurement and

logistics brokers, corporate shells, and entities supporting the military-industrial and dual-use supply chains. As sanctions mature, the highest payoff designations are those that disrupt the infrastructure of adaptation and evasion, rather than those that simply restate political condemnation. This implies a shift towards a structured typology of listings with clear functional purposes: decision-making and war-authorisation nodes; war-enabling industrial and financial nodes; circumvention and facilitation nodes; and influence-operation nodes. Such typology is necessary both for effectiveness and for governance clarity, because it helps prevent "list inflation" and supports evidence-based prioritisation. In the baseline scenario, prospectiveness therefore depends on whether the EU can maintain a disciplined, network-oriented listing policy that keeps pace with adaptation while preserving legal defensibility.

Under an escalation scenario, listings become a high-tempo escalatory tool, but their effectiveness depends on the coalition's ability to accelerate the designation pipeline without degrading evidentiary standards. In practice, escalation increases the risk that political pressure for rapid additions outpaces the ability to build robust factual records and to coordinate across Member States and partners. The calibration priority in this scenario is therefore to preserve procedural credibility and to avoid predictable legal vulnerabilities that could undermine signalling. Escalation is also the scenario in which cross-jurisdictional coordination becomes most decisive: if the EU lists entities that can immediately re-route operations through non-aligned jurisdictions or substitute intermediaries, the operational effect will be diluted. Consequently, the prospectiveness of listings under escalation is maximised when designations are paired with: (1) strong anti-circumvention follow-up; (2) alignment with partner jurisdictions where feasible; and (3) clear communications that distinguish between symbolic designations and infrastructure-disrupting designations. In other words, escalation does not require "more of the same"; it requires a faster, more precise listing regime that targets enabling systems rather than only visible figures.

Under a partial de-escalation scenario, listings remain prospectively valuable primarily as a conditionality and reversibility tool. In this case, the policy challenge is to distinguish between: (i) core designations that must remain as long as risk persists (decision-making nodes, war enabling, and systematic circumvention facilitators), and (ii) peripheral or time-bound designations that can be reviewed under a structured, verifiable framework without undermining deterrence. The calibration priority here is to maintain credibility: easing should be strictly conditional, evidence-based, reversible, and insulated from ad hoc political bargaining. A disciplined review mechanism can support coalition unity by demonstrating that sanctions are not purely punitive but are tied to measurable behavioural conditions. However, de-escalation also increases the risk of fragmentation: different Member States may push for faster easing, and listed parties will intensify legal challenges. Therefore, the prospectiveness of listings under de-escalation depends on robust review governance and clear minimum conditions for any adjustment.

Across all scenarios, five calibration priorities should be treated as central to preserving and strengthening listing effectiveness through 2030.

First, prioritise network-based targeting over status-based targeting. As the list expands, the incremental effect of adding high-profile political figures declines, while the effect of targeting facilitators and enabling nodes remains significant. Network targeting requires better mapping of ownership, control, and functional roles, but it yields higher operational returns.

Secondly, strengthen evidentiary standards and legal resilience. Listings are vulnerable to judicial scrutiny and require clear grounds, accurate identification, and a demonstrable link to the sanctionable conduct. Improving the quality of statements of reasons and maintaining regular updates where roles change will reduce legal reversals and enhance compliance usability.

Thirdly, integrate listings with anti-circumvention engineering. Designations should be operationally connected to the mechanisms by which evasion occurs—third-country intermediaries, proxy ownership, logistics nodes, and service providers. This requires rapid follow-up and coordinated monitoring, otherwise designations lag behind adaptation.

Fourthly, improve cross-jurisdictional coordination and "external compliance gravity". The operational effect of listings increases when partner jurisdictions align and when global intermediaries treat EU designations as high-risk globally. Where full alignment is not feasible, the EU can still increase external compliance gravity by targeting key nodes that interact with EU markets, services, and payment infrastructures.

Fifthly, prevent list inflation through typology, periodic review, and impact-oriented metrics. Without structured prioritisation, a growing list can dilute analytical focus and reduce marginal returns. A typology-based approach also supports internal and external communication: it makes clear whether a designation is intended primarily for signalling, deterrence, infrastructure disruption, or anti-circumvention.

Taken together, these priorities imply that the most prospectively valuable listings regime for 2026–2030 is one that is selective in strategic logic but high-tempo in maintenance, legally robust, and integrated with broader sanctions enforcement. The practical objective is not to expand the list indefinitely, but to keep the list aligned with the evolving structure of war-enabling and circumvention networks, while preserving coalition legitimacy and legal defensibility.

2.3.5. Visa and Diplomatic Restrictions: Prospects and Governance Conditions

Over the 2026–2030 horizon, visa and diplomatic restrictions remain prospectively valuable primarily as durable refusal-of-normalisation instruments and as risk-management tools that reduce the physical operationality of sanctions-relevant networks and constrain hostile activity conducted through privileged mobility channels. Their core strategic utility is therefore governance-oriented: they shape the access regime to EU space, raise procedural friction, and support internal security resilience, rather than delivering direct coercive leverage over Russia's strategic decisions. This makes their prospectiveness highly dependent on the EU's ability to sustain a coherent admission posture across Member States, to manage exceptions in a legally robust way, and to calibrate diplomatic controls without triggering avoidable governance or reciprocity risks. In contrast to listings, where marginal returns can be increased through network targeting, the marginal returns of visa measures are more tightly bound by political sensitivity and legal proportionality. Consequently, the most realistic route to stronger effectiveness through 2030 is selective, risk-based refinement rather than maximalist closure.

In the baseline continuation scenario, the principal function of visa restrictions is to maintain a stable institutional signal that the EU is not returning to facilitated interaction under conditions of ongoing aggression and destabilisation. The prospectiveness of the visa track here is high insofar as it can be sustained at relatively low macroeconomic cost while contributing to the coalition narrative and to the closure of ancillary circumvention pathways. However, baseline continuation also increases the risk of implementation drift: (1) national practices can diverge, (2) administrative fatigue can set in, and (3) exceptions can widen over time under domestic political pressures. Consequently, the key governance condition is harmonised implementation. This requires consistent application of Visa Code standards to Russian nationals, disciplined practice on multiple-entry visas, and shared risk indicators for scrutiny. Where harmonisation is weak, the "access gradient" effect re-emerges, and the instrument's deterrent and integrity value declines. Therefore, sustaining prospectiveness under baseline continuation depends less on introducing new legal acts and more on maintaining a stable and predictable implementation regime with measurable convergence across Member States.

In an escalation scenario, visa and diplomatic restrictions can support a stronger posture by increasing the cost of mobility for higher-risk categories and by tightening controls in areas with clear security justification. The most prospectively effective escalatory use of this track is not a blanket closure, but targeted tightening that preserves legal defensibility and coalition legitimacy. Overreach is a central risk: measures that are perceived as collective punishment can generate reputational costs, provide adversarial propaganda narratives, and increase intra-EU political friction. Accordingly, escalation governance conditions include: clear rationale grounded in security and sanctions objectives;

disciplined exception management; and robust communications emphasising targeted risk management rather than indiscriminate exclusion. For diplomatic restrictions specifically—such as movement controls on Russian diplomats within the EU—the escalation scenario increases their utility, but also increases reciprocity risk and legal sensitivity. Therefore, prospectiveness depends on careful procedural institutionalisation, high-quality information sharing, and consistent implementation so that the measure delivers real security value without unnecessary political spillover.

In a partial de-escalation scenario, the visa and diplomatic track becomes a critical test case for conditionality governance. The principal policy challenge is to avoid premature normalisation while maintaining credible pathways for limited adjustment where verifiable conditions justify it. Prospectiveness in this scenario lies in the ability to maintain a baseline refusal-of-normalisation posture—no return to facilitation—while allowing narrowly defined, evidence-based calibrations (e.g., refining multiple-entry visa practice or adjusting certain diplomatic procedures) that are reversible and do not undermine coalition unity. In governance terms, de-escalation increases internal divergence risk: Member States may differ more sharply on the pace and scope of easing, and domestic political pressures may push for bilateral exceptions. Consequently, prospectiveness depends on explicit EU-level criteria and disciplined coordination that prevents fragmentation. In addition, the exception system becomes more politically contested, requiring tighter verification and clearer typology to preserve integrity.

Across scenarios, four governance conditions should be treated as decisive for preserving and strengthening the visa and diplomatic track through 2030.

First, sustained harmonisation and implementation discipline. The effectiveness of visa measures is highly sensitive to Member State practice variance. Stronger EU-level guidance, data-sharing, and consistent application of risk-based scrutiny reduce the access-gradient problem and increase deterrence.

Secondly, managed proportionality and exception integrity. Humanitarian, family, educational, and medical exceptions are legally and politically necessary, but they must be narrowly defined, verifiable, and monitored to prevent systematic leakage. The governance goal is to preserve legitimacy while avoiding exceptions becoming a circumvention channel.

Thirdly, administrative and digital capacity. A risk-oriented admission regime requires adequate staffing, interoperable systems, and security coordination. Without capacity, the system risks either bureaucratic overload (reducing quality) or de facto superficial checks (reducing effectiveness). Capacity-building is therefore a necessary condition for durable effectiveness.

Fourthly, calibrated diplomatic controls grounded in security rationale. Movement controls on diplomats and related measures are prospectively valuable where they address identifiable hostile-activity risks. Their sustainability depends on clear procedures, information sharing, proportionality, and anticipation of reciprocity dynamics.

Overall, the prospects for visa and diplomatic restrictions through 2026–2030 are strongest where they are managed as a selective, risk-based governance regime that preserves refusal-of-normalisation, strengthens security resilience, and reduces the physical operationality of sanctions-relevant networks, while maintaining legal defensibility and coalition legitimacy. Their strategic value is therefore stable but bounded: they are unlikely to deliver direct coercive effects, yet they remain a durable "closure" and resilience instrument that supports the cumulative effectiveness of the broader sanctions' architecture.

2.3.6. Media and Information Influence Restrictions: Prospects and Anti-Circumvention Engineering

Over 2026–2030, restrictions on media and information influence remain prospectively valuable as a hybrid-domain resilience tool and as an infrastructural sanctions instrument that limits the mainstream

distribution and amplification capacity of Russian state-controlled or state-aligned influence channels within EU jurisdiction. Their strategic utility is stable because hostile information activity is a low-cost, scalable capability that is unlikely to disappear even if the military trajectory changes. However, the prospectiveness of this block is uniquely dependent on the EU's ability to sustain continuous anti-circumvention engineering. Unlike listings or visa measures, which can retain a relatively stable baseline effect once implemented, media restrictions face an inherently high adaptation rate: rebrands, mirrors, proxy channels, platform migration, and the diffusion of content into closed ecosystems can erode operational impact unless the regime is managed as a maintained system. Consequently, the central 2026–2030 question is whether the EU can move from a primarily channel-centric approach to a more durable network-and-supply-chain disruption model, while preserving legal defensibility and coalition legitimacy.

In the baseline continuation scenario, the principal function of media restrictions is to preserve a durable refusal-of-normalisation in the information domain and to reduce mainstream reach and algorithmic amplification of sanctioned outlets. Prospectiveness under baseline continuation is high insofar as these measures remain politically legible and operationally implementable via intermediary obligations. The main degradation risk is governance drift: as the list of restricted outlets grows, the regime can suffer from diminishing marginal returns if updates become slower than adaptation or if implementation becomes uneven among platforms and carriers. Therefore, the key calibration priority under baseline conditions is a high-tempo maintenance cycle: monitoring, rapid updates, and consistent compliance signals that reduce response lags. In practice, baseline continuation calls for a disciplined focus on high-impact distribution nodes and monetisation pathways, rather than an undifferentiated expansion of outlet names. This is the governance logic of durability: effectiveness is maintained not by periodic symbolic additions, but by keeping the compliance perimeter aligned with the evolving ecosystem.

In an escalation scenario, media restrictions become a central component of resilience policy because information operations typically intensify in parallel with kinetic escalation, targeting public opinion, coalition cohesion, and sanction support. Under escalation, the EU's prospective advantage is the ability to reduce mainstream amplification rapidly through the Article 2f framework and related intermediary obligations. However, escalation also increases the risk of overreach: rapid expansion without evidentiary robustness, ambiguous definitions of prohibited facilitation, and inconsistent platform implementation can undermine legitimacy and produce counterproductive "censorship" narratives. Consequently, the prospectiveness of this block under escalation depends on the EU's capacity to combine speed with legal precision: fast targeting of proxies and enabling networks, paired with clear statements of reasons and disciplined communications emphasising state control and war-propaganda function. Escalation also heightens the importance of international coordination: when major platforms apply global compliance standards, the operational effect is stronger; when they segment compliance by jurisdiction, circumvention becomes easier. Therefore, escalation governance requires structured engagement with intermediaries and partners to reduce external substitution channels.

In a partial de-escalation scenario, the media block remains prospectively valuable as a conditionality tool, but it becomes politically more contested. Pressure for "normalisation" may extend to information restrictions, including claims that bans should be lifted as part of broader easing. The governance challenge is to preserve a clear distinction between pluralistic media content and state-controlled influence operations linked to aggression and destabilisation. Prospectiveness in this scenario depends on the EU's capacity to maintain criteria-based review without undermining deterrence: core restrictions should remain in place as long as state control and hostile-information function persist, while any adjustments should be narrowly defined, verifiable, and reversible. Importantly, de-escalation increases litigation and reputational sensitivity; therefore, legal defensibility and evidence quality become even more central. In practical terms, the media block's prospectiveness under de-escalation depends on whether the EU can anchor restrictions in demonstrable security rationale and maintain coherent coalition communications to prevent fragmentation.

Across scenarios, four anti-circumvention engineering priorities should be treated as decisive for sustaining and strengthening effectiveness through 2030.

First, shift from channel-centric bans to network-and-services disruption. The primary operational risk is that outlet names change while the enabling network persists. A more durable model targets the organisational infrastructure—entities, managers, monetisation routes, and enabling services—so that rebranding yields lower substitution value. This requires coordinated use of Article 2f restrictions with complementary tools (including, where warranted, listing measures against influence operators and entities) and with services restrictions where relevant.

Secondly, accelerate the update cycle and prioritise high-impact nodes. Anti-circumvention is fundamentally a tempo competition. The shorter the lag between identification of mirrors/proxies and the compliance response, the lower the adaptation benefit. Prioritisation is critical: the regime should focus on high-reach distribution nodes and high-leverage monetisation pathways rather than dispersing effort across low-impact targets.

Thirdly, strengthen intermediary compliance governance. Because the regime relies heavily on platforms, carriers, and service providers, consistent guidance, notification procedures, and enforcement signalling are essential. The EU's effectiveness increases when intermediaries internalise obligations as a uniform compliance baseline, reducing "soft spots" and preventing jurisdiction shopping. This also requires monitoring of compliance performance and the ability to address systematic under-implementation.

Fourthly, develop credible metrics and evidence models. The sustainability of the media block depends on credible demonstration of intermediate effects: reductions in mainstream availability, reach, amplification, and monetisation, alongside tracking of rebrand/mirror frequency and diffusion routes. Without such metrics, the regime risks both list inflation and political fragility. Metrics also enable proportionality: they support targeted design by linking restrictions to measurable security outcomes rather than to broad, contested assertions.

Overall, the prospectiveness of media and information influence restrictions through 2026–2030 is strongest where the EU treats this block as a continuously managed system of sanctions engineering, integrated with broader enforcement and compliance governance, rather than as a static set of bans. The realistic objective is to constrain scale, legitimacy, and operational efficiency of hostile influence activity within EU jurisdiction, while limiting counterproductive reputational effects through targeted, evidence-based design and disciplined communications. This instrument therefore remains high-utility but adaptation-sensitive: it delivers meaningful resilience and governance benefits, provided the EU sustains the tempo, coordination, and evidentiary robustness required for durable anti-circumvention performance.

2.3.7. Cross-Cutting Implementation Constraints (2026–2030)

Across 2026–2030, the prospectiveness of political sanctions against the Russian Federation will be constrained less by the formal availability of legal instruments and more by a set of cross-cutting implementation constraints that shape the regime's durability, coherence, and operational density. The preceding subsections have shown that listings, visa/diplomatic restrictions, and media measures all share a common dependency: they generate their strongest effects when they are implemented with high consistency, supported by credible evidence, and maintained through continuous governance cycles. These characteristics become more demanding over time, because long-running sanctions regimes face adaptation by the target, fatigue within implementing systems, and political pressures within the coalition. Consequently, the 2026–2030 outlook must treat implementation constraints not as secondary technicalities, but as primary determinants of whether political sanctions remain strategically useful. Three constraints are particularly decisive: coalition cohesion and political

throughput capacity; administrative and digital capacity for enforcement and monitoring; and legal defensibility and proportionality under judicial and public scrutiny.

The first constraint is coalition cohesion and political throughput capacity. Political sanctions are inherently multi-actor instruments: they require sustained agreement among Member States, consistent messaging, and the ability to take timely decisions when updates are needed. Over a multi-year horizon, cohesion is challenged by domestic political cycles, divergent economic sensitivities, shifts in public opinion, and the cumulative burden of sanctions governance. Even where formal agreement exists, throughput can degrade: packages take longer to negotiate, updates become incremental, and the tempo of response lags behind adaptation by the target. This is particularly consequential for media restrictions and network-based listings, which require high-tempo updates to remain effective. Moreover, coalition cohesion is not only internal; it includes alignment with key partners, which affects cross-jurisdictional reach and "external compliance gravity". If cohesion weakens—either through intra-EU fragmentation or reduced partner alignment—political sanctions can become less dense and more porous, increasing substitution opportunities. Therefore, through 2026–2030, maintaining throughput capacity is a core constraint: without it, the regime risks becoming symbolically durable but operationally stale.

The second constraint is administrative and digital capacity. Political sanctions operate through complex implementation ecosystems: competent authorities, consular services, border agencies, financial-intelligence and compliance bodies, and—critically—private intermediaries. As sanctions mature, the need for high-quality data fusion increases: identifying beneficial ownership and networks for listings; harmonising risk indicators for visa scrutiny; monitoring mirrors and proxies for media restrictions; and tracking circumvention patterns across jurisdictions. This requires interoperable systems, trained personnel, and sustained resourcing. Capacity constraints manifest in predictable failure modes: delays in processing and updates, inconsistent implementation, superficial checks, and overreliance on private compliance without sufficient public oversight. Over time, capacity challenges can also produce bureaucratic friction that undermines legitimacy and generates political backlash, particularly in visa and media domains. Consequently, the 2026–2030 prospectiveness of political sanctions depends on continuous capacity-building—digital interoperability, analytical staffing, and operational coordination—rather than on the existence of legal powers alone.

The third constraint is legal defensibility and proportionality, including litigation exposure and reputational sustainability. The EU sanctions framework operates within a rule-of-law environment in which restrictive measures must meet standards of legal basis, evidence, procedural fairness, and proportionality. This is a strength, but it also imposes real constraints on speed and scope, especially for listings and media restrictions, which can be challenged directly or indirectly. Over a multi-year horizon, legal risk increases as the volume of measures grows and as targeted actors invest more in legal challenges. If evidentiary standards slip or if measures are perceived as overly broad, judicial setbacks can erode the credibility and operational coherence of the regime. In addition, proportionality constraints are not only judicial; they are political. Visa measures and media restrictions are particularly sensitive to narratives of collective punishment or censorship, which can undermine coalition legitimacy and provide adversarial propaganda material. Therefore, legal defensibility and proportionality are binding constraints: they set the maximum sustainable intensity of the political sanctions track and require continuous quality control—clear statements of reasons, precise definitions, transparent rationale, and disciplined public communication.

A further cross-cutting constraint is the adaptation and substitution capacity of the target and its networks, which interacts with all three primary constraints. Russia and associated actors are likely to remain adaptive in 2026–2030, using re-routing, rebranding, proxy ownership, third-country intermediaries, and digital workarounds. This means that even well-designed measures will experience effectiveness decay if the coalition's throughput slows, if implementation capacity is insufficient, or if legal constraints prevent rapid updating. In practical terms, adaptation transforms political sanctions

from “one-off decisions” into “tempo competitions”: effectiveness is increasingly determined by the speed at which the EU can identify new nodes and update restrictions while maintaining legal quality.

Taken together, these cross-cutting constraints imply that the prospectiveness of political sanctions through 2030 will be highest where the EU treats them as a managed system requiring continuous governance investment: (1) coalition cohesion and throughput must be maintained; (2) administrative and digital capacity must be strengthened; (3) legal defensibility must be protected; and (4) adaptation must be anticipated through rapid, typology-driven updates. Without these conditions, political sanctions risk drifting into a regime of high symbolic visibility but declining operational density—retaining political signalling value while losing a proportion of their capacity to constrain hostile operational space. This diagnosis sets up the next subsection, which addresses how political sanctions interact with other sanctions domains and compliance instruments, and why cross-domain integration is necessary to mitigate these constraints.

2.3.8. Interaction with Other Sanctions Domains and Policy Instruments

The prospectiveness of political sanctions over 2026–2030 is materially shaped by their interaction with other sanctions domains and with the broader set of policy instruments that constitute EU sanctions governance. Political sanctions rarely deliver their strongest effects in isolation. Their operational value increases when they are integrated with economic, financial, trade, transport, and legal measures, and when they reinforce the compliance ecosystem that turns legal prohibitions into real behavioural constraints. In this sense, political sanctions operate as closure and coherence instruments: they narrow institutional and physical pathways that would otherwise enable circumvention, they strengthen the reputational and compliance gravity of the regime, and they sustain coalition signalling that underpins more complex sectoral restrictions. Consequently, assessing 2026–2030 prospectiveness requires viewing political sanctions not as a parallel track, but as a set of tools that can increase the effectiveness and enforceability of the entire sanctions’ architecture.

A first interaction channel is the linkage between listings and financial/asset-based enforcement. Listings trigger asset freezes and prohibitions on making funds and economic resources available, but the real-world impact depends on financial intelligence, beneficial ownership tracing, and cross-border compliance cooperation. When integrated effectively with financial sanctions, listings can be used to target: (1) key facilitators of sanctions circumvention; (2) intermediaries enabling export-control evasion; (3) entities providing payment, crypto, or trade-finance services; and (4) proxy ownership structures that sit behind nominally non-sanctioned vehicles. In 2026–2030, as circumvention networks mature, this interaction becomes increasingly central: political sanctions that identify and constrain the human and corporate nodes of evasion amplify the effectiveness of sectoral prohibitions that otherwise leak through intermediaries. The implication is that listing strategy should be informed by financial-enforcement priorities and by intelligence on how restricted goods, services, and funds are routed. Without such integration, listings risk becoming primarily symbolic while the operational network adapts.

A second interaction channel is the linkage between political sanctions and trade, export-control, and industrial restrictions. Sectoral sanctions often operate through complex product lists, licensing regimes, and service prohibitions; their enforceability depends heavily on controlling brokers, logistics routes, and third-country facilitators. Political sanctions can support this domain by constraining the human and organisational infrastructure of procurement, logistics, and technical services. Network-based listings of intermediaries, procurement agents, and corporate shells increase transaction friction, raise compliance refusal rates, and reduce the availability of low-risk facilitators. Visa restrictions can reduce physical operationality—limiting the ability of procurement actors to travel, negotiate, and coordinate on EU territory. Media restrictions can reduce the informational scaffolding that advertises circumvention services or legitimises prohibited trade practices. Consequently, the interaction is

cumulative: political sanctions help "close" the supply-chain and services environment in which export controls operate, reducing the gap between legal prohibition and practical leakage.

A third interaction channel is the relationship between political sanctions and transport and logistics restrictions. Transport measures (aviation bans, port access constraints, road transport limits) shape the physical movement of goods and persons, but they can be undermined by intermediaries and by reflagging, rerouting, and transhipment practices. Listings that target logistics operators, freight brokers, and enabling entities can raise the cost of workaround routes and increase the risk of enforcement detection. Visa measures, while not directly a transport sanction, contribute indirectly by tightening the personal mobility environment for actors who operate logistical circumvention schemes. Similarly, media restrictions can reduce the public visibility and legitimacy of "grey logistics" narratives and can limit certain channels used to coordinate or market logistics workarounds. In 2026–2030, where Russia's adaptation will likely rely on complex logistics chains through third countries, these cross-domain linkages can materially improve enforcement outcomes.

A fourth interaction channel concerns legal sanctions, accountability measures, and institutional conditionality. Political sanctions perform a bridge function between legal qualification and operational restriction: they institutionalise the EU's assessment of unacceptable conduct and provide enforceable constraints that can be maintained over time. Where accountability and legal measures (for example, evidence collection, asset tracing for potential future reparations frameworks, or institutional conditionality for any future adjustment) progress, political sanctions can provide the governance scaffolding that keeps pressure coherent and reversible. Listings create an institutional archive of responsibility and affiliation; visa/diplomatic restrictions sustain refusal-of-normalisation; media restrictions codify the EU's boundary against state-controlled war propaganda. This interaction is particularly relevant under a de-escalation scenario, where conditionality becomes central: political sanctions can be calibrated to support verifiable steps without losing deterrence, thereby linking legal and political pathways.

A fifth interaction channel is with hybrid measures and security policy tools. Political sanctions in the media and diplomatic domains overlap with hybrid-security governance: countering hostile intelligence activity, protecting democratic processes, and strengthening societal resilience. This means that their prospectiveness is improved when they are coordinated with non-sanctions security instruments—such as resilience programmes, cyber defence measures, counter-disinformation strategies, and law-enforcement cooperation—while remaining clearly grounded in the sanctions' legal framework. The value of this integration is twofold: it increases operational effectiveness by linking sanctions to threat intelligence and risk indicators, and it increases legitimacy by anchoring restrictions in demonstrable security rationales rather than in ambiguous political preferences.

Finally, a decisive interaction domain is the compliance toolset that translates sanctions policy into real-world behaviour. Over 2026–2030, the prospectiveness of political sanctions will increasingly depend on the quality of: (1) consolidated guidance and FAQs; (2) sanctions registers and structured data for private-sector compliance; (3) mechanisms for rapid notification and updates; (4) enforcement coordination and typology-driven prioritisation; and (5) outreach to intermediaries and platforms. Political sanctions amplify the compliance environment because they create visible, person- and entity-specific risk signals (listings), clear access constraints (visa and diplomatic restrictions), and explicit distribution prohibitions (media measures). However, the same visibility can produce governance costs if guidance is ambiguous or if updates are inconsistent across Member States. Therefore, the interaction between political sanctions and compliance instruments is not incidental; it is a core determinant of operational density and coalition durability.

In sum, political sanctions are most prospectively valuable in 2026–2030 when they are treated as integrated closure tools within the broader sanctions' architecture: they support export controls by constraining facilitators, reinforce financial sanctions by targeting network nodes, strengthen transport restrictions by raising circumvention costs, and enhance hybrid resilience by limiting hostile information

and diplomatic operational space. This integration also mitigates the cross-cutting constraints identified in 2.3.7, because it improves intelligence flow, prioritisation, and enforcement coherence. The practical implication for continuation strategy is clear: political sanctions should be calibrated in tandem with economic, legal, hybrid, and compliance instruments, with shared typologies and metrics, so that the overall regime remains strategically coherent and operationally sustainable through 2030.

2.3.9. Metrics and Evidence Model for Monitoring Effectiveness (2026–2030)

A credible 2026–2030 continuation strategy for political sanctions requires a metrics and evidence model that is both analytically rigorous and operationally usable. Without a structured monitoring framework, political sanctions are vulnerable to two recurrent failures: first, they are judged against inappropriate end-state criteria (for example, immediate strategic reversal by the Russian leadership), producing an artificial "ineffectiveness" narrative; secondly, they are defended on the basis of inputs (numbers of packages, numbers of listings) rather than outcomes, which weakens credibility and impedes calibration. The purpose of this subsection is therefore to define a multi-criteria model that links each political sanctions' instrument to measurable intermediate effects consistent with its plausible mechanism of impact. The model must also be designed for a long horizon: it should capture persistence, adaptation, and the decay rate of effects, not only short-term shocks. Finally, given the known reliability issues with some Russian official statistics and communication, the evidence model should be explicitly triangulated: Russian-source indicators should be compared systematically with EU, US, and other international datasets and with reputable independent analytical outputs.

The monitoring model should be built around three principles. First, instrument–mechanism alignment: each metric must reflect what the instrument can realistically change (reach, mobility, compliance friction, network disruption), not what it cannot reliably change directly (strategic war decisions). Secondly, triangulation and comparability: each indicator should have at least two independent sources or measurement pathways, and cross-Member State comparability should be prioritised. Thirdly, actionability: metrics should support decision-making by indicating where effectiveness is decaying, where circumvention is increasing, and where implementation gaps are widening. In practical governance terms, the model should generate a periodic dashboard with clear thresholds that trigger review, targeted reinforcement, or reprioritisation.

For listings (individual restrictive measures), the evidence model should focus on network disruption and compliance effects rather than on headline counts of designated persons and entities. Core metric clusters include: (1) asset-disruption proxies—value of assets frozen where data is available, but more importantly the number and significance of blocked accounts/transactions and the frequency of compliance refusals linked to listed entities; (2) network fragmentation indicators—frequency of corporate restructuring, beneficial ownership changes, and substitution of intermediaries following listings; (3) transaction friction measures—increased use of complex routing (e.g., third-country intermediaries, layered corporate shells), longer payment chains, and increased transaction costs reported by compliance and investigative sources; and (4) legal resilience metrics—rate of successful/unsuccessful legal challenges, number of listings requiring amendment due to identification issues, and time-to-update for changes in roles. A practical proxy for "external compliance gravity" can be derived from partner alignment: the share of high-impact EU listings mirrored by key partners and the observed reduction in third-country service provision to listed parties. Crucially, listings metrics should distinguish between categories: symbolic designations, infrastructure disruptors, and anti-circumvention designations, as they are expected to produce different measurable effects.

For visa and diplomatic restrictions, the evidence model should centre on implementation convergence, risk-based filtering, and the integrity of exceptions. Key clusters include: (1) issuance/refusal patterns—total short-stay visas issued to Russian nationals, refusal rates, and processing time trends, disaggregated by Member State; (2) multiple-entry visa (MEV) structure—share of MEVs versus single-entry visas, average validity periods, and shifts over time following adapted rules; (3) implementation

variance indicators—dispersion metrics across Member States (for example, standard deviation in refusal rates and MEV shares), which directly track the "access gradient" problem; (4) exception integrity indicators—shares of visas issued under humanitarian/family/medical/education grounds and indicators of verification intensity; and (5) diplomatic movement control indicators—where data is available, notification/authorisation volumes and compliance anomalies, linked to security reporting on hostile activity patterns. Because this domain is politically sensitive and data may be uneven, triangulation is essential: official EU/Member State data should be paired with Schengen-wide aggregated statistics, audit reports, and where appropriate, reputable independent assessments of mobility patterns.

For media and information influence restrictions, measurement must prioritise reach, availability, monetisation, and adaptation rather than binary "blocked/unblocked" status. Key clusters include: (1) availability indicators—whether named outlets are accessible on mainstream carriers/platforms in the EU, disaggregated by Member State and major intermediary; (2) reach and engagement proxies—traffic trends to sanctioned outlet domains, platform engagement proxies, and distribution volumes where open-source intelligence and reputable analytics allow; (3) amplification indicators—presence in algorithmically promoted surfaces, re-upload frequency, and cross-platform diffusion patterns; (4) monetisation signals—advertising presence, payment or donation facilitation pathways, and evidence of third-party monetisation support; and (5) circumvention tempo metrics—frequency of rebrands, mirror-domain creation, proxy channel emergence, and the lag between emergence and enforcement response. A core governance metric here is time-to-response: the duration between identification of a proxy/mirror and effective reduction of its mainstream availability. This is the most direct indicator of whether the EU is winning the tempo competition inherent in this domain.

To ensure coherence across instruments, the model should include a set of cross-cutting indicators. These include: (1) coalition throughput—time from identification of a new risk node to adoption of a relevant measure; (2) implementation coherence—measures of divergence across Member States and across major intermediaries; (3) capacity indicators—staffing, interoperability milestones, and system deployment relevant to sanctions enforcement; and (4) adaptation pressure—observed growth of circumvention networks and substitution pathways. In addition, a structured qualitative layer is necessary: periodic case studies of specific circumvention networks or influence operations can validate whether quantitative indicators reflect real behavioural shifts. Such case studies should draw on reputable independent institutions and investigative outputs, and should explicitly flag any discrepancies between Russian narratives and external evidence, treating systematic discrepancies as a risk signal rather than as neutral noise.

Finally, the evidence model should be institutionalised as a review cycle aligned with sanctions governance. A practical approach is a semi-annual dashboard supplemented by quarterly rapid briefs in high-tempo periods, with each cycle producing: (1) an assessment of where effectiveness is stable, decaying, or improving; (2) a set of recommended recalibrations; and (3) a litigation and proportionality risk review. Over 2026–2030, the ability to maintain an evidence-based monitoring regime will be a decisive determinant of prospectiveness: it supports proportionality, prevents list inflation, strengthens coalition legitimacy, and enables faster anti-circumvention engineering. In short, political sanctions remain strategically useful when they are monitored and managed as a system; the metrics and evidence model is the mechanism by which that management remains credible and adaptive over the full horizon.

2.3.10. Risk Management: Counterproductive Effects and Mitigation

A 2026–2030 continuation strategy for political sanctions must incorporate explicit risk management for counterproductive effects, because the political sanctions track operates in domains that are unusually sensitive to narrative dynamics, legitimacy challenges, and unintended spillovers. Unlike purely technical trade controls, political sanctions interact directly with mobility, visibility, reputation, and

public communication. This makes them vulnerable to three recurrent risks: (1) the risk of adversarial reframing (for example, “collective punishment” or “censorship” narratives); (2) the risk of coalition friction and uneven implementation driven by domestic politics; and (3) the risk of unintended harm to humanitarian channels, civil society linkages, and long-term EU normative positioning. The purpose of this subsection is not to argue for weaker sanctions, but to define mitigation approaches that preserve effectiveness while reducing self-inflicted governance costs. In practice, mitigation is a condition of durability: a sanctions regime that cannot manage counterproductive effects becomes politically brittle, legally vulnerable, and operationally porous.

A first risk category is narrative and legitimacy blowback, particularly for visa and media restrictions. Visa measures can be framed as collective punishment of Russian citizens, potentially strengthening adversarial mobilisation narratives and reducing EU soft power. Media restrictions can be framed as censorship, used to undermine the EU’s rule-of-law narrative and to energise disinformation about “Western hypocrisy”. These reframings are not merely reputational; they can affect operational outcomes by weakening coalition cohesion, reducing platform cooperation, and increasing public contestation. Mitigation requires a disciplined communications doctrine that consistently anchors measures in: (1) the security and war-propaganda rationale; (2) the state-controlled or state-aligned character of targeted channels; and (3) the existence of proportionality safeguards and humanitarian exceptions where relevant. For listings, mitigation requires clarity about the targeting logic: designations should be communicated as responsibility and facilitation constraints rather than as symbolic gestures. In all cases, mitigation is stronger when the EU can point to documented evidence of state control, coordination, or sanctions-relevant facilitation, and when it avoids broad, ambiguous categories that are easier to caricature as indiscriminate repression.

A second risk category is coalition divergence and implementation drift. Over 2026–2030, domestic political cycles, differentiated exposure to Russia-related risks, and varying public attitudes can produce divergence in willingness to enforce, update, or maintain measures. This is particularly acute for visa restrictions, where national administrative discretion is substantial, and for media restrictions, where platform engagement and enforcement intensity can vary. The counterproductive effect is a porous regime: divergences create “soft spots” that facilitate circumvention and undermine deterrence. Mitigation requires a governance approach that treats implementation variance as a measurable risk indicator and responds with harmonised guidance, shared risk indicators, and targeted capacity support. It also requires coalition discipline in sequencing: avoiding abrupt shifts that create internal political backlash, and instead adopting predictable review cycles with clear criteria. Partner alignment is part of this mitigation: where possible, coordination with key partners reduces substitution pathways and strengthens external compliance gravity.

A third risk category is humanitarian and civil society spillovers. Visa restrictions, if poorly calibrated, can unintentionally restrict access for humanitarian cases, independent civil society actors, journalists, or individuals seeking protection. Even where exceptions exist on paper, administrative overload or overly rigid practice can reduce access in practice. This creates reputational risk and can weaken the EU’s normative claims, while also undermining long-term strategic interests by reducing people-to-people channels and informational pluralism. Mitigation requires clear typology of exceptions, verifiable criteria, and operational capacity to process legitimate cases without creating large loopholes. The strategic objective is to preserve humanitarian integrity without creating systemic leakage. This is best achieved through risk-based screening, stronger verification, and clarity in consular guidance. In addition, periodic audits of exception practice can identify whether humanitarian channels are functioning and whether abuse is occurring.

A fourth risk category is legal vulnerability and due process exposure, particularly for listings and certain aspects of media restrictions. Judicial challenges can produce partial rollbacks or force amendments, creating both operational gaps and reputational narratives of illegitimacy. The counterproductive effect is not only the loss of a specific designation but also the erosion of confidence among intermediaries and Member States in the regime’s robustness. Mitigation is primarily evidentiary: (1) high-quality

statements of reasons, (2) accurate identification data, (3) clear linkage to sanctionable conduct, and (4) timely updates when roles or corporate structures change. For media restrictions, mitigation requires clear definitional boundaries and evidence of state control or instrumentalisation, reducing the scope for claims that measures are arbitrary. A disciplined litigation-risk review cycle—linked to the metrics model in 2.3.9—should be treated as a standard element of sanctions governance, not an afterthought.

A fifth risk category is counter-circumvention escalation and unintended innovation. As political sanctions tighten, the target may respond by accelerating circumvention innovation: more sophisticated proxy ownership, increased use of third-country intermediaries, and more decentralised information distribution. A poorly designed regime can therefore shift the ecosystem towards less visible, harder-to-monitor channels, reducing transparency and increasing enforcement burden. Mitigation does not mean avoiding pressure; it means anticipating adaptation and investing in monitoring capacity, typology-driven prioritisation, and rapid update cycles. The objective is to ensure that adaptation raises the target's costs more than it degrades EU visibility and control. In the media domain, this implies focusing on supply-chain disruption and monetisation pathways rather than only channel labels. In listings, it implies targeting facilitators and service providers. In visas, it implies reducing access gradients and strengthening verification for higher-risk categories.

Finally, mitigation requires discipline in sanctions design and communication. The most durable political sanctions are those that are clearly targeted, evidence-based, legally robust, and operationally implementable, with exceptions managed in a transparent and controlled way. Where the EU can demonstrate that measures are connected to identifiable risks—war enabling, circumvention facilitation, hostile information activity, or security threats—counterproductive narratives are harder to sustain and coalition coherence is easier to maintain. Conversely, where measures drift towards broad or poorly evidenced restrictions, counterproductive effects become more likely, and effectiveness decays through fragmentation and litigation. Therefore, the 2026–2030 risk-management approach should be treated as an enabling condition for prospectiveness: it preserves legitimacy, reduces internal friction, and sustains the operational density of political sanctions over a long horizon. This provides a necessary bridge to the next subsection, which defines conditions for adjustment and the logic of escalation triggers and conditional easing pathways.

2.3.11. Conditions for Adjustment: Escalation Triggers and Conditional Easing Logic

A prospectively sustainable political sanctions strategy for 2026–2030 requires explicit conditions for adjustment—both for tightening (escalation) and for any form of conditional easing (de-escalation). Without a structured adjustment logic, the sanctions regime risks two failures: rigidity, where measures cannot respond credibly to changes in behaviour or risk and therefore lose strategic coherence; and arbitrariness, where ad hoc easing or tightening undermines deterrence and coalition trust. Political sanctions are particularly sensitive to this issue because they are visible, narrative-relevant, and often interpreted as the coalition's "political line". Consequently, the EU's adjustment framework must combine: (1) clear triggers grounded in observable events and risk indicators; (2) evidence-based decision thresholds; (3) reversibility mechanisms; and (4) disciplined communications that preserve legitimacy. The objective is not to promise easing, but to maintain credible conditionality: pressure is increased when risk escalates and can be calibrated only when verifiable change justifies it, without sacrificing the capacity for rapid re-tightening.

Escalation triggers should be defined as a structured set of event-based and behaviour-based indicators that directly relate to the strategic functions of political sanctions—delegitimation, institutional constraint, resilience, and anti-circumvention closure. The most salient event-based triggers include: (1) renewed territorial expansion steps or annexation-related actions; (2) documented escalation of attacks on civilians or critical infrastructure; formal measures that deepen the integration of occupied territories into Russian administrative structures; and (3) materially intensified hybrid operations against EU Member States (including coordinated disinformation operations, covert influence activity targeting

elections, or increased hostile intelligence activity). Behaviour-based triggers should include: demonstrable growth in sanctions circumvention networks, particularly through third-country intermediaries; sustained evidence of state-supported procurement of restricted goods and services via proxy structures; and systematic use of media influence operations to facilitate circumvention or to destabilise coalition cohesion. In governance terms, escalation triggers should be linked to tempo: if circumvention adapts faster than the EU updates its measures, escalation may be required not only in scope but in governance capacity (more rapid cycles, tighter intermediary obligations, and more network-oriented listings). Importantly, escalation should not be treated as a uniform response. It should be calibrated by instrument: listings can expand to facilitators and intermediaries. Visa and diplomatic restrictions can tighten in higher-risk categories and in diplomatic mobility controls. Media restrictions can extend to proxies and enabling networks under a faster anti-circumvention cycle.

Conditional easing logic must be framed with equal clarity, but with stricter evidentiary thresholds, because premature normalisation is a strategic risk. Conditional easing should be understood as a sequenced and reversible calibration of measures, not as a binary "lifting" of political sanctions. The core condition for any easing is verifiable change in baseline behaviour that directly relates to the EU's sanctions rationale. Examples of such conditions, expressed at the level of principle rather than political promise, include: (1) sustained and verifiable cessation or significant reduction of hostilities; (2) demonstrable withdrawal steps or verified compliance with agreed security arrangements; (3) meaningful reduction in hostile hybrid activity directed at the EU; and (4) verifiable cessation of specific destabilising behaviours that the sanctions regime targets. Because political sanctions also serve a resilience function, easing criteria should include not only changes in military behaviour but also changes in information and influence operations, including demonstrable structural change in state control or instrumentalisation of specific propaganda outlets. Any easing must also be contingent on access to verification mechanisms; without monitoring, easing undermines deterrence and increases the risk of strategic deception.

For listings, conditional easing logic should rely on a tiered approach. Core designations—decision-making nodes, war-enabling and military-industrial entities, and systematic circumvention facilitators—should remain in place unless there is sustained, verifiable structural change that materially reduces risk. Peripheral designations, particularly where the link to current risk is time-bound or role-dependent, can be placed under a structured review process with clear evidentiary criteria. Critically, easing should not occur through ad hoc removals; it should occur through a governed review cycle that preserves legal defensibility and coalition coherence. This includes clear statements of reasons for both continuation and adjustment, and the ability to re-list rapidly if conditions are breached. For visa and diplomatic measures, conditional easing should be even more cautious: a return to "facilitation" should not be treated as a baseline option. Adjustments, where justified, should focus on narrowly defined categories and improved predictability for legitimate travel, while maintaining risk-based scrutiny and robust exception verification. For media restrictions, conditional easing should be tied to demonstrable changes in state control and the war-propaganda function; absent such change, maintaining restrictions remains consistent with the resilience rationale. Where reviews are introduced, they should be criteria-based and reversible, with monitoring of re-emergence through proxies.

Reversibility is a core design requirement. Any conditional easing should be structured so that the EU can rapidly re-tighten measures if triggers reappear or if verification fails. This implies maintaining legal bases, maintaining data and evidence trails, and preserving implementation capacity even during partial easing. A practical approach is to define "snapback" conditions and to embed them in the governance cycle: escalation triggers should operate as automatic review triggers, and easing should be conditional on continued compliance with verification. Reversibility also has a coalition dimension: Member States and partners must have confidence that easing will not be exploited, otherwise coalition cohesion will fracture. Consequently, the adjustment framework should be designed to maintain trust through transparency, clear thresholds, and consistent application.

Finally, the adjustment framework must be integrated with the metrics and evidence model set out in 2.3.9. Escalation triggers and easing conditions should not be purely political; they should be connected to measurable indicators: growth in circumvention networks, increased proxy emergence rates in media, widening implementation gaps, and changes in mobility and diplomatic risk patterns. This integration ensures that adjustment decisions are evidence-based and defensible, reduces vulnerability to legal challenge and reputational attacks, and improves the EU's ability to communicate the rationale for calibration. In sum, a prospectively durable 2026–2030 political sanctions strategy requires a clear conditionality logic: tightening when risk escalates; maintaining pressure under baseline conditions; and considering any easing only when verifiable change and monitoring capacity justify it, with strong reversibility safeguards.

2.3.12. Summary Judgement on Prospectiveness (2026–2030)

Taken as a whole, the political sanctions track remains prospectively valuable over 2026–2030 as a durable set of governance instruments that can sustain pressure, protect EU resilience, and constrain the operational space of Russia-associated decision-enabling and circumvention networks. The central analytical conclusion is that political sanctions offer high strategic utility with bounded autonomous coercion: they are unlikely, in isolation, to produce a predictable strategic reversal by the Russian state, but they can materially shape the environment in which Russia and affiliated actors operate by institutionalising delegitimation, restricting manoeuvrability, and densifying the compliance perimeter. This prospectiveness is strongest when the regime is managed as a coherent system—integrated with broader sanctions enforcement, maintained through continuous anti-circumvention cycles, and protected by robust legal defensibility and coalition legitimacy. Conversely, prospectiveness degrades when political sanctions are treated as an input-driven exercise (counting packages and designations) rather than as an outcome-driven governance tool, or when implementation capacity and cohesion erode faster than the target's adaptation capacity.

Across the baseline, escalation, and partial de-escalation scenarios, the strategic functions that political sanctions reliably preserve—delegitimation, institutional constraint, coalition signalling, hybrid-domain resilience, and anti-circumvention support—remain relevant and policy-relevant through 2030. Under baseline continuation, political sanctions are most valuable as instruments of persistent friction and refusal of normalisation, sustaining a coherent response posture while supporting the closure of circumvention pathways. Under escalation, they provide a high-visibility and relatively rapid means of tightening the operating environment for hostile activity, provided the EU can maintain tempo and evidentiary quality. Under partial de-escalation, political sanctions remain valuable as a conditionality and reversibility framework that can structure sequenced adjustment without undermining deterrence. In all scenarios, the value proposition is therefore less about immediate coercion and more about durable governance effects that preserve EU strategic consistency and reduce the operational efficiency of hostile networks.

The report's synthesis across instrument groups supports a differentiated judgement. Listings remain the most flexible and scalable political instrument, with strong prospectiveness where targeting is network-based and integrated with anti-circumvention engineering; their key risks are list inflation and legal vulnerability, which can be mitigated by typology, evidentiary discipline, and periodic review. Visa and diplomatic restrictions remain prospectively valuable as refusal-of-normalisation and risk-management tools, especially where harmonised implementation and exception integrity are maintained; their key risks are implementation drift, reputational sensitivity, and capacity constraints, which require selective, risk-based refinement rather than maximalist closure. Media and information influence restrictions remain prospectively valuable as resilience instruments, but are uniquely adaptation-sensitive; their durability depends on high-tempo anti-circumvention maintenance, supply-chain and services disruption, and credible metrics. In aggregate, this indicates that the political

sanctions track can remain effective through 2030, but only if it is managed as an adaptive system rather than as a static list of prohibitions.

The binding constraints for prospectiveness are clear. Coalition cohesion and political throughput capacity set the tempo at which political sanctions can be updated to match adaptation. Administrative and digital capacity determines whether measures are implemented consistently and whether monitoring and evidence-building keep pace. Legal defensibility and proportionality determine sustainability in a rule-of-law environment and protect the regime from judicial and reputational erosion. These constraints imply that the "best value" continuation strategy is one that emphasises selective, high-impact targeting, continuous maintenance cycles, and strong integration with enforcement and compliance instruments. It also implies that risk management is not optional: counterproductive narrative effects, humanitarian spillovers, and coalition drift must be anticipated and mitigated through disciplined design, communications, and exception governance.

Accordingly, the summary judgement for 2026–2030 is that continuing political sanctions is highly prospectively justified, provided that the EU adopts a calibration approach that is: (1) network-oriented and anti-circumvention integrated for listings; (2) harmonised, risk-based, and exception-disciplined for visa and diplomatic measures; and (3) supply-chain focused, high-tempo, and metrics-driven for media restrictions. The regime should be anchored in a clear adjustment logic: escalation in response to defined triggers and conditional easing only under verifiable change, with strong reversibility safeguards. Under these conditions, political sanctions can continue to deliver durable strategic functions—delegitimation, resilience, and operational constraint—while reinforcing the cumulative effectiveness of the broader EU sanctions architecture against the Russian Federation through 2030.

2.4. Proposals to Increase Political Sanctions Pressure

2.4.1. Deepening Personalisation

Deepening personalisation is one of the most prospectively effective ways to strengthen the political sanctions track because it increases the precision of pressure while supporting the EU's rule-of-law requirements of targeting, proportionality, and evidentiary clarity. In practical terms, "personalisation" should be understood not as an expansion of listings for its sake, but as a deliberate shift towards identifying and constraining individual decision-enablers, operational enablers, and key beneficiaries of the war-enabling and circumvention ecosystem. The objective is to raise the cost of participation and facilitation by shrinking the set of actors who can operate with low-friction access to international services, assets, and mobility, while also strengthening the delegitimation function and the external compliance gravity of EU measures. This approach is especially relevant in a mature sanctions' environment, where marginal returns from broad, symbolic designations decline and where the highest operational value comes from targeting network nodes that sustain procurement, financing, logistics, information influence, and institutional durability.

A first direction for strengthening is functional segmentation of designations. The EU's designation strategy should be structured around a typology that distinguishes, at minimum: (1) political and security decision-making nodes; (2) war-enabling administrative operators (mobilisation, procurement, occupation administration, coercive apparatus); (3) financial and corporate enablers (beneficial owners, trustees, nominee networks, family and proxy structures); (4) circumvention facilitators (brokers, freight and trade intermediaries, third-country service nodes with EU nexus); and (5) influence operators (media managers, propagandists, and coordinators of information influence operations). This segmentation increases effectiveness because it allows each designation "block" to be assessed and justified by its mechanism of impact, reducing list inflation and improving legal defensibility. It also

improves communications: the EU can explain clearly that designations are not a symbolic "name-and-shame" exercise, but a targeted disruption of war-enabling functions.

A second direction is moving from status-based to role- and network-based listings. The marginal value of listing high-profile figures decreases once key political leadership and obvious elites are already designated. The higher payoff lies in identifying those who make the system operable: procurement agents, compliance-evasion specialists, logistics coordinators, corporate service providers, and individuals who manage cross-border structures that preserve access to assets and services. The design principle is "function over fame": prioritise actors whose removal from compliant markets and services produces measurable friction, forces costly substitution, and disrupts supply-chain and financial routing. This implies systematic use of network analysis to map beneficial ownership, control relationships, proxy directors, and recurring intermediary patterns. Where possible, designations should target clusters rather than single nodes, to prevent simple substitution by adjacent proxies.

A third direction is strengthening evidentiary robustness and identification precision, which is a necessary condition for personalisation to remain scalable and durable. For natural persons, designation files should be supported by clear statements of reasons, accurate identifiers, and up-to-date role descriptions, reducing litigation vulnerability and improving compliance usability. For network-based personalisation, evidentiary strategy should incorporate: (1) link analysis demonstrating control, ownership, or operational facilitation; (2) transactional indicators where legally available; (3) corporate registry evidence and open-source intelligence triangulated with Member State competent authority inputs; and (4) time-stamped role evidence to address the "role change" problem. This is not merely a legal constraint. It is an operational necessity, because private intermediaries rely on clarity to implement restrictions effectively. Higher evidentiary quality also supports faster anti-circumvention updates by reducing disputes about scope and identity.

A fourth direction is tightening the linkage between personal listings and mobility/visa controls, where legally and operationally appropriate. The EU's political track is strongest when instruments reinforce each other: a designated individual should face not only asset and services constraints but also reduced physical operationality in EU space, subject to legal requirements and the specific architecture of visa measures. This does not require indiscriminate travel restrictions. It requires coherent risk-based alignment so that high-risk, high-function individuals face a dense set of constraints across access channels. In governance terms, this alignment increases deterrence and reduces the capacity of designated actors to manage circumvention through on-the-ground coordination. It also increases the credibility of conditionality: personalisation is meaningful when it is reflected consistently across the sanctions' ecosystem.

A fifth direction is expanding personalisation into the influence-operation and hybrid domain through targeted designations of coordinators, financiers, and organisational operators, not only public-facing propagandists. The media restriction regime reduces mainstream reach of certain outlets, but network-based personalisation can disrupt the enabling infrastructure: directors, editors-in-chief with operational authority, financing coordinators, and intermediaries that provide hosting, production, or monetisation support with an EU nexus. This is not designed as a general media policy. It is a sanctions tool targeting hostile influence operations linked to aggression and destabilisation. The operational advantage is that it shifts the pressure from easily replaceable brand labels to harder-to-replace organisational competence and funding channels. To preserve legal defensibility, such designations must be tied clearly to state control, coordination, or facilitation of hostile activity, with evidence sufficient to support proportionality.

A sixth direction is introducing a disciplined review and renewal mechanism for personalised measures to prevent both overbreadth and under-inclusiveness. A mature personalisation regime should be continuously maintained: new roles emerge, proxies replace designated individuals, and corporate structures mutate. A periodic review cycle—linked to the metrics model—should identify where designations have lost operational relevance (e.g., the individual has been fully replaced) and where

clusters should be updated to capture new proxies. This is not "weakening"; it is a method of keeping the regime aligned with operational reality. It also reduces legal vulnerability by demonstrating that designations are maintained on the basis of current evidence and risk, not simply inertia.

Finally, deepening personalisation should be implemented with explicit safeguards to protect coalition legitimacy: clear targeting logic, demonstrable nexus to war enabling or circumvention facilitation, and disciplined communications that emphasise function and responsibility rather than identity. In a long-horizon sanctions environment, personalisation remains one of the highest-value strengthening levers precisely because it can increase pressure density while remaining compatible with proportionality and rule-of-law constraints. The practical benchmark for success is not the number of new names, but the degree to which personalisation measurably increases compliance friction, disrupts enabling networks, and reduces the operational space for war-supporting and sanctions-evasion activity.

2.4.2. Extending Sanctions to Transit Elites and Para-State Structures

Extending political sanctions to transit elites and para-state structures is a logical next step in strengthening pressure where the Russian war-enabling system increasingly relies on intermediated access—through third-country jurisdictions, proxy ownership, and quasi-public corporate vehicles that sit between the state and the market. In a mature sanctions' environment, direct state actors and prominent elites are often already constrained; the operational frontier shifts to those who maintain functional continuity: (1) brokers who can operate across jurisdictions, (2) business-political networks that control logistics and procurement pathways, and (3) para-state structures that provide financing, coordination, and institutional cover. The objective of this subsection is therefore to define how the EU can expand political sanctions in a way that targets transit capacity—the ability to move money, goods, influence, and services through intermediary ecosystems—while remaining compatible with legal defensibility, proportionality, and coalition sustainability. The focus is not on punitive breadth, but on strategic closure: reducing substitution channels that dilute the operational effect of existing measures.

A first direction is the structured targeting of transit elites as a functional category. "Transit elites" should be treated as individuals who are not necessarily part of the formal state hierarchy but who perform critical bridging roles: they connect sanctioned Russian entities to third-country markets, provide corporate and financial structuring, secure logistics and insurance arrangements, or mediate access to sensitive goods and services. In practical sanctions design, this category includes procurement brokers, freight and trade intermediaries, facilitators operating through free zones and transhipment hubs, owners or managers of corporate service vehicles used to disguise beneficial ownership, and high-trust intermediaries who provide reputational cover for transactions. The key design principle is to prioritise actors whose removal from EU-compliant services forces network reconfiguration and increases costs across multiple transaction pathways. Such designations should be clustered and evidence-based, focusing on recurring nodes rather than one-off actors, to prevent immediate substitution.

A second direction is expanding pressure on para-state structures that operate as institutional intermediaries between the Russian state and economic or influence activity. This category includes state-owned enterprises and their key subsidiaries in strategic sectors, quasi-state foundations and funds used for financing or procurement support, state-affiliated corporate groups that manage logistics, construction, or occupation-related projects, and other entities that provide administrative or financial scaffolding without being formally governmental bodies. The strategic advantage of targeting para-state structures is that they often combine state direction with market-facing interfaces; they therefore serve as conduits for procurement, funding, and foreign contracting. Political sanctions here can take two complementary forms: (1) entity listings (asset freezes and services denial via compliance gravity) and, (2) where legally available, tighter restrictions on services and enabling activities that support their operations. The critical governance requirement is to articulate the war-enabling or circumvention-facilitating nexus clearly, ensuring that measures remain defensible and are understood as disruption of hostile capacity rather than broad economic punishment.

A third direction is targeting third-country facilitation nodes with an EU nexus. While the EU does not apply extraterritorial sanctions in the same manner as some jurisdictions, it can still increase external compliance gravity by targeting intermediaries that depend on EU markets, EU financial services, EU insurance, EU ports, EU technology, or EU corporate presence. This includes third-country entities and individuals who provide sanctioned services (payments, crypto routing, trade finance, shipping management, or procurement brokerage) and whose operations intersect with EU jurisdiction. The design principle is to select targets where EU leverage is real: where denial of EU services or access materially increases the cost of continued facilitation. This approach also supports coalition signalling: it communicates that structured circumvention through third countries will attract targeted pressure. To preserve legitimacy and manage diplomatic sensitivity, the targeting must be tightly evidenced and framed as anti-circumvention enforcement rather than as pressure on third countries as such.

A fourth direction is integrating transit-elite and para-state targeting with anti-circumvention engineering. The effectiveness of these measures depends on the tempo at which proxies are identified and re-designated as networks adapt. This requires institutionalising a monitoring loop that draws on customs and trade anomaly data, financial intelligence, corporate registry analysis, and reputable investigative reporting. Operationally, the EU should prioritise network clusters: when a facilitator is designated, associated corporate shells, nominee directors, and service providers that enable continuity should be mapped for follow-on action. This reduces substitution value and prevents the regime from being gamed through rapid corporate reconfiguration. In governance terms, this approach also improves proportionality: it targets the network's enabling functions rather than sweeping categories.

A fifth direction is managing political and legal sensitivity through typology, evidence, and communication discipline. Transit elites and para-state structures often operate in grey zones, and designation decisions can be politically contentious, especially where third-country actors are involved. To reduce litigation and reputational risk, designations should be anchored in a clear mechanism of sanctionable conduct: measurable facilitation of sanctions evasion, material support to war-enabling activity, or coordination of hostile influence operations. Communications should avoid broad insinuations and focus on specific behaviours and roles. Within the EU, this discipline protects coalition cohesion; externally, it reduces the risk of diplomatic misinterpretation by framing measures as enforcement of EU restrictive measures rather than as geopolitical pressure on third states.

A sixth direction is linking this expansion to impact-oriented metrics. Because the objective is closure of substitution channels, effectiveness should be monitored via indicators such as: (1) reductions in specific circumvention routes, (2) increased transaction friction in targeted corridors, (3) shifts in trade anomaly patterns, and (4) observed changes in intermediary networks following designations. This also supports calibration: where designations do not produce measurable disruption, the network model should be refined; where disruption is observed, follow-on designations should consolidate gains. Metrics are therefore not optional; they are the mechanism by which the EU can avoid list inflation and maintain strategic focus on high-impact transit capacity.

Overall, extending political sanctions to transit elites and para-state structures is prospectively valuable through 2026–2030 because it addresses the central dynamic of a mature sanctions' environment: adaptation via intermediaries. The strategic aim is to reduce the availability of low-risk bridging actors and quasi-state conduits that keep war-enabling and circumvention systems operational. The most effective approach is selective and network-based: target the nodes that connect Russia's war-enabling system to external markets and services, prioritise those with an EU nexus, integrate designations with anti-circumvention engineering, and maintain legal defensibility through evidence and disciplined communication. Done in this manner, the expansion can materially increase the operational density of the political sanctions regime without requiring maximalist escalation and without undermining coalition legitimacy.

2.5. Conclusion

Part Two frames political sanctions as a distinct class of restrictive measures whose primary mechanism is the narrowing of a target state's diplomatic room for manoeuvre, institutional participation, and international legitimacy, rather than the direct infliction of quantifiable economic damage. It stresses that treating political sanctions as merely "symbolic" is analytically misleading, because contemporary political isolation regimes can generate practical constraints on negotiation channels, coalition-building capacity, and access to influence platforms. The section therefore defines political sanctions by their dominant impact channel—delegitimation and political–institutional restriction—while also recognising that these measures frequently reinforce sectoral and personal measures by shaping the normative coalition environment. It emphasises the multilayered nature of implementation: some political restrictions are codified in legal acts, while others operate through coordinated diplomatic practice, institutional choices, and coalition signalling. A key methodological point is that political sanctions must be assessed through multi-dimensional criteria, including international consolidation and the durability of the isolation regime, rather than by a single "behaviour change" test. The report also highlights that political sanctions often function as the initial framework that stabilises later escalation in economic and legal domains. It positions political sanctions as an instrument of governance as much as foreign policy, because they organise coalition coherence and raise reputational costs for facilitation. This conceptual base sets up the later review sections to treat political measures as operationally meaningful within the overall sanctions' architecture.

The review then reconstructs the rationales for political sanctions and links them to a broader interpretive context in which European institutions and partners view Russia's actions as a systemic challenge to international law and European security norms. The report's logic is that political sanctions "fix" a shared qualification of events and thereby create a stable normative baseline for subsequent restrictive measures. It underscores that the causal story is not event-only but structural: political sanctions reflect accumulated tensions and a perceived threat to the European order, which is why the coalition has sustained measures over multiple years. This helps explain why political instruments persist even when their material impact is difficult to measure in economic indicators. The analysis also highlights that political sanctions work partly through signalling and reputational effects that convert into compliance behaviour by private and public intermediaries. In this sense, the "compliance gravity" of the regime is supported by political delegitimation, because actors anticipate regulatory and reputational risk from association with designated networks. The report treats this as a practical channel, not an abstract moral stance: risk management becomes a behavioural transmission mechanism. The outcome is a pressure environment in which the cost of normalisation rises for third parties, which indirectly supports the enforcement of economic and technological restrictions. This is why political sanctions are positioned as foundational rather than auxiliary.

A substantial portion of Part Two examines the "personalisation" track through individual restrictive measures (listings), emphasising that listings are not a decorative appendix to sectoral sanctions but an increasingly autonomous channel of targeted pressure. The report explains the legal architecture that enables listings to operate at scale through consolidated acts and recurring implementing decisions, which makes them highly reproducible and adaptable over time. It highlights a key shift: listings evolve from status-based, high-profile designations toward more function- and network-based targeting of operational enablers, facilitators, and beneficiaries. The analytical emphasis is on network effects—how designations disrupt enabling infrastructures such as procurement, logistics coordination, proxy ownership, and service access—rather than simply punishing symbolic figures. This is reinforced by the idea that listings can be updated more frequently than major sectoral bans, allowing the coalition to sustain "sanctions tempo" even when broader escalation is politically costly. The report also points out that legal robustness and evidentiary discipline are decisive for maintaining scalability, because weak dossiers create litigation vulnerability and reduce compliance usability. It frames this as a rule-of-law constraint that is not merely legalistic but operational, since compliance teams require clear identifiers

and reasons to implement restrictions reliably. As the regime matures, this combination of precision and update capacity makes listings one of the most flexible tools for maintaining political pressure.

Part Two also covers the wider political domain beyond listings, including visa, diplomatic, and information-influence restrictions, treating them as a coherent track even when their legal bases differ. The report's evaluative logic is that these instruments constrain international manoeuvrability and reduce the capacity to normalise relations without verifiable changes in baseline conditions. It treats political sanctions as particularly effective at maintaining coalition coherence and public signalling, which matters in prolonged conflict settings where credibility and deterrence are cumulative. At the same time, it acknowledges structural constraints: coalition manageability, proportionality, and the risk of diminishing marginal returns if measures become repetitive or insufficiently targeted. The "prospectiveness" analysis for 2026–2030 is framed as conditional effectiveness: whether measures remain implementable, legally robust, and strategically useful under plausible future conditions, rather than whether they can force a predictable strategic reversal. This approach explicitly anticipates adaptation and circumvention pressures, arguing that effectiveness should be interpreted as the capacity to maintain pressure under adaptation. It also anticipates that governance capacity—update tempo, coherence of messaging, and enforcement discipline—will increasingly determine marginal effectiveness as the regime matures. The report therefore moves the reader away from snapshot judgments and toward an operating-range model of political sanctions. This is consistent with the broader analytical stance of treating sanctions as a governance system that must be maintained, not a one-off decision that either "works" or "fails".

The proposals section advances a practical tightening agenda focused on deepening personalisation through segmentation, network targeting, and improved evidentiary quality, with the explicit aim of increasing precision while remaining compatible with EU rule-of-law requirements. The report recommends shifting from "fame-based" to "function-based" designation logic by prioritising decision-enablers, operational facilitators, proxy ownership managers, and influence operators whose removal produces measurable friction in financing, procurement, logistics, and information channels. It emphasises that segmentation improves both defensibility and communication, allowing the coalition to explain designations as disruption of war-enabling functions rather than indiscriminate naming. The recommendations also implicitly treat political sanctions as the coordination layer that keeps the overall sanctions architecture socially and diplomatically coherent, reducing the risk of premature normalisation. The underlying analytical claim is that the highest value comes from targeting clusters rather than isolated nodes, because clusters reduce the scope for simple substitution by adjacent proxies. The section also stresses that the long-run effectiveness of political sanctions depends on maintaining update tempo and compliance clarity, since ambiguity and uneven enforcement weaken deterrence and create arbitrage spaces. In aggregate, Part Two concludes that political sanctions are most effective when they are engineered as a durable governance track: legally robust, network-oriented, regularly updated, and integrated with other sanctions domains through compliance-mediated pressure. It positions the political track as a necessary condition for sustaining the coherence and enforceability of the broader sanctions' regime through 2030, even though it is not, on its own, a mechanism for predictable strategic capitulation.