

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



EUROPEAN INSTITUTE FOR INNOVATION DEVELOPMENT



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

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Content

Abstract	9
General Introduction	15
PART ONE. Introduction	20
1.1. Objectives and Tasks of the Analytical Study	20
1.1.1. Rationale for the Need for a Comprehensive Analysis of the EU and Partners’ Sanctions Architecture	20
1.1.2. The Relationship between Sanctions Policy and the Analysis of the Social, Economic and Political Condition of the Russian Federation	22
1.2. Methodological Framework of the Study	25
1.2.1. Political Economy Analysis	25
1.2.2. Institutional and Legal Analysis	28
1.2.3. Comparative-Historical Approach	31
1.2.4. Public Policy Effectiveness Analysis	34
1.3. Sanctions as an Instrument of Foreign-Policy Coercion	37
1.3.1. The Concept of Sanctions in International Practice	37
1.3.2. The Evolution of Sanctions from “Targeted” Measures to Systemic and Hybrid Regimes	39
1.3.3. Specific Features of the Sanctions’ Regime against the Russian Federation (2022–2025)	42
1.3.4. Objectives of the Sanctions Regime against the Russian Federation	44
1.4. Conclusion	48
PART TWO. Sanctions in the Political Sphere and Their Effectiveness	50
2.1. General Characteristics of Political Sanctions	50
2.1.1. The Concept of Political Sanctions	50
2.1.2. Reasons for the Introduction of Sanctions against Russia	52
2.1.3. Historical Analogues	55
2.2. Review of Political Sanctions	58
2.2.1. Individual Restrictive Measures	58
2.2.2. Visa and Diplomatic Restrictions	73
2.2.3. Restrictions on Information Influence and Media	86
2.3. Prospects for Continuing Political Sanctions (2026–2030)	98

2.3.1. Purpose and Scope of the 2026–2030 Outlook	98
2.3.2. Strategic Functions to Be Preserved	99
2.3.3. Scenario Frame for 2026–2030	101
2.3.4. Listings: Prospects and Calibration Priorities	102
2.3.5. Visa and Diplomatic Restrictions: Prospects and Governance Conditions	104
2.3.6. Media and Information Influence Restrictions: Prospects and Anti Circumvention Engineering	105
2.3.7. Cross-Cutting Implementation Constraints (2026–2030)	107
2.3.8. Interaction with Other Sanctions Domains and Policy Instruments	109
2.3.9. Metrics and Evidence Model for Monitoring Effectiveness (2026–2030)	111
2.3.10. Risk Management: Counterproductive Effects and Mitigation	112
2.3.11. Conditions for Adjustment: Escalation Triggers and Conditional Easing Logic	114
2.3.12. Summary Judgement on Prospectiveness (2026–2030)	116
2.4. Proposals to Increase Political Sanctions Pressure	117
2.4.1. Deepening Personalisation	117
2.4.2. Extending Sanctions to Transit Elites and Para-State Structures	119
2.5. Conclusion	121
PART THREE. Sanctions in the Economic Sphere and Their Effectiveness	123
3.1. General Characteristics of Economic Sanctions	123
3.1.1. Economic Sanctions as a Form of Structural Pressure	123
3.1.2. Distinction from Classical 20th-Century Trade Embargoes	124
3.2. Overview of Economic Sanctions	126
3.2.1. Financial Sanctions and the Banking Sector	126
3.2.2. Energy Sanctions	148
3.2.3. Trade, Industrial, and Technological Restrictions	170
3.2.4. Transport and Logistics	190
3.3. Prospectiveness of Economic Sanctions (2026–2030)	208
3.3.1. Purpose, Scope, and Evaluative Assumptions (2026–2030 Outlook)	208
3.3.2. Strategic Functions to Preserve in the Economic Track	212
3.3.3. Scenario Frame for 2026–2030	214
3.3.4. Financial Sanctions (2026–2030) — Prospectiveness and Constraints	217
3.3.5. Energy Sanctions (2026–2030) — Prospectiveness and Constraints	220
3.3.6. Trade-Industrial and Technology Restrictions (2026–2030) — Prospectiveness and Constraints	223

3.3.7. Transport and Logistics Restrictions (2026–2030) — Prospectiveness and Constraints	229
3.4. Proposals for Strengthening Economic Pressure	237
3.4.1. Secondary Sanctions	237
3.4.2. Extraterritorial Measures	242
3.4.3. Energy-Decarbonisation Linkage of Sanctions	248
3.5. Conclusion	253
PART FOUR. Social Sanctions and Their Effectiveness	256
4.1. General profile of social sanctions	256
4.1.1. Definition and Scope of “Social Sanctions” (EU–Russia Context)	256
4.1.2. Causal Architecture: Direct Restrictions vs Indirect Social Effects	259
4.1.3. Measurement and Attribution	264
4.1.4. Targeting Logic and Legitimacy Constraints	269
4.2. Review of Social Sanctions	275
4.2.1. Visa Mobility	275
4.2.2. Consumer Restrictions	281
4.2.3. Everyday Financial Life of Citizens	287
4.3. Social Costs and the Limits of Sanction Acceptability	293
4.3.1. Distributional Impacts and Vulnerability Mapping	293
4.3.2. Humanitarian and Fundamental-Rights Thresholds	298
4.3.3. Social Cohesion Effects and Unintended Consequences	303
4.3.4. Compliance Externalities and the Problem of over-Compliance	310
4.3.5. Historical Features Shaping Russian Society (Context for Social-Sanctions Acceptability)	316
4.4. Prospects for Social Sanctions Policy against Russia (2026–2030)	347
4.4.1. Scenarios and Policy Drivers	347
4.4.2. Expected Evolution of Instrument Design	355
4.4.3. Anticipated Adaptation Pathways	259
4.4.4. Effectiveness Outlook and Evaluative Framework	364
4.5. Proposals for Ethically Robust Social Measures against Russia	369
4.5.1. Design Principles: Proportionality, Precision, and Reversibility	369
4.5.2. Exemptions and Protected Channels	376
4.5.3. Governance against Over-Compliance and Discrimination	384
4.5.4. Monitoring and Feedback Loop	390

PART FIVE. Sanctions in the Legal Sphere and Their Effectiveness	398
5.1. General Characteristics of Legal Sanctions	398
5.1.1. Legal Sanctions as a Normative and Institutional Regime	398
5.1.2. Sources of Legal Authority and Regulatory Architecture	405
5.1.3. Core Legal Mechanisms of Restriction	411
5.1.4. Legal Limits, Derogations, and Judicial Review	419
5.2. Review of Legal Sanctions	423
5.2.1. Asset Freezes and the Immobilisation of Economic Resources	423
5.2.2. Non-Recognition and Non-Enforcement of Certain Russian Anti-Suit Injunctions, Judgments, and Related Penalties	431
5.2.3. Restrictions on Legal Advisory and Arbitration-Related Services	437
5.2.4. Restrictions on Intellectual-Property Rights, Trade Secrets, and Related Technology Rights	445
5.3. Long-Term Legal Resilience of Sanctions	452
5.3.1. Conditions of Legal Resilience: Clarity, Precision, and Update Capacity	452
5.3.2. Judicial Defensibility and Litigation Pressure	459
5.3.3. Enforcement Convergence, Over-Compliance, and Private-Law Frictions	467
5.3.4. 2026–2030 Outlook: Stability Factors, Erosion Risks, and Adjustment Triggers	473
5.4. Proposals for the Further Development of the Legal Sanctions Regime	480
5.4.1. Improving Normative Precision and Drafting Discipline	480
5.4.2. Protected Legal Pathways and Controlled Derogations	487
5.4.3. Stronger Enforcement Coordination and Anti-Circumvention Governance	494
5.4.4. Monitoring, Periodic Review, and Legal-Quality Feedback Loop	501
PART SIX. Hybrid Sanctions Measures	509
6.1. Definition of Hybrid Sanctions	509
6.1.1. Hybrid Sanctions as a Cross-Domain Restrictive Architecture	509
6.1.2. Mechanisms of Hybridisation: Law, Market Behaviour, and Enabling Infrastructures	516
6.1.3. Boundary Questions: Distinction from Political, Economic, Legal, and Compliance Sanctions	525
6.1.4. Targeting Logic, Attribution Difficulties, and Legitimacy Constraints	533
6.2. Review of Hybrid Instruments	541
6.2.1. Anti-Circumvention Measures and Controls on Intermediary Jurisdictions	541
6.2.2. Logistics, Maritime Routing, and the Shadow Fleet as Hybrid Pressure Zones	549
6.2.3. Technology–Service Ecosystem Controls and Dual-Use Support Restrictions	557

6.2.4. Network-Based Listings and Restrictions on Facilitation Infrastructures	564
6.3. Effectiveness Assessment	571
6.3.1. Criteria and Indicators of Hybrid-Sanctions Effectiveness	571
6.3.2. Comparative Strengths of Hybrid Measures	577
6.3.3. Structural Limits, Enforcement Risks, and Unintended Effects	584
6.3.4. 2026–2030 Outlook: Durability Conditions, Erosion Risks, and Recalibration Triggers	592
PART SEVEN. Sanctions Compliance Architecture	600
7.1. Compliance as a Cornerstone of Sanctions Policy	600
7.1.1. Compliance as the Operational Transmission Mechanism of Sanctions	600
7.1.2. The Governance Logic of Compliance: From Legal Obligation to Risk-Based Control	608
7.1.3. Public–Private Interface in Sanctions Implementation	616
7.1.4. Compliance, Legal Certainty, and Policy Credibility	625
7.2. Core Compliance Instruments	632
7.2.1. Screening, Listing Checks, and Beneficial-Ownership Verification	632
7.2.2. Trade-Control Compliance: Export, Re-Export, and End-Use Due Diligence	639
7.2.3. Financial, Insurance, and Payment-System Compliance	647
7.2.4. Licensing, Derogations, Internal Controls, and Audit Trails	654
7.3. Circumvention Risks and Enforcement Challenges	663
7.3.1. Typologies of Circumvention: Intermediaries, Re-Routing, and Proxy Structures	663
7.3.2. Weak Points in the Compliance Chain	672
7.3.3. Over-Compliance, De-Risking, and Private-Law Frictions	679
7.3.4. Enforcement Coordination and the Limits of Detection Capacity	686
7.4. Compliance Outlook (2026–2030)	694
7.4.1. Strategic Functions to Preserve in the Compliance Track	694
7.4.2. Expected Evolution of Compliance Architecture	703
7.4.3. Risk Outlook: Fragmentation, Fatigue, and Adaptive Circumvention	709
7.4.4. 2026–2030 Effectiveness Outlook and Adjustment Triggers	716
PART EIGHT. Analytical Conclusions	724
8.1. Overall Effectiveness of the EU Sanctions’ Regime	724
8.1.1. Effectiveness as a Multi-Dimensional Rather than Binary Category	724
8.1.2. Comparative Assessment across the Six Dimensions of the Report	730

8.1.3. Cumulative Pressure, Interaction Effects, and Time Horizons	735
8.1.4. Overall Judgement on the Strategic Value of the Current Regime (2022–2025)	741
8.2. Structural limitations of sanctions-based coercion	745
8.2.1. Limits of Direct Coercion against a Large Adaptive Authoritarian State	745
8.2.2. Adaptation, Re-Routing, and External Intermediary Channels	749
8.2.3. Internal Constraints within the EU and the Coalition	752
8.2.4. The Risk of Diminishing Returns and Sanctions Fatigue	756
8.3. Conditions under which sanctions may contribute to political transformation in the Russian Federation	760
8.3.1. Political Transformation as an Indirect and Mediated Outcome	760
8.3.2. Channels of Transformative Influence: Fiscal, Technological, Institutional, and Elite-Level	763
8.3.3. Necessary Conditions for Transformative Impact	767
8.3.4. Conditions under which Transformative Expectations Should Be Treated with Caution	771
General Conclusions	775
References	782

PART EIGHT

Analytical Conclusions

8.1. Overall Effectiveness of the EU Sanctions’ Regime

8.1.1. Effectiveness as a Multi-Dimensional Rather than Binary Category

The central methodological error in much public debate is to ask whether sanctions against Russia have “worked” as if the regime had a single purpose and a single test of success. Such a question is analytically inadequate because EU restrictive measures are officially presented as an instrument for changing harmful policies, while recent scholarship has argued that sanctions effectiveness should not be reduced to behavioural change alone. In the Russian case, the relevant issue is therefore not binary success or failure, but the differentiated performance of several sanction functions operating at the same time. A sanctions regime may fail to compel immediate policy reversal yet still degrade material capabilities, deter certain transactions, coordinate a coalition, legitimise a common policy line, and institutionalise durable governance practices. Conversely, a regime may look impressive in legal volume while underperforming in transmission, enforcement, or strategic focus. The proper analytical starting point is thus functional differentiation rather than rhetorical verdict. That logic is especially important for a report which has already shown, across its political, economic, social, legal, hybrid, and compliance parts, that the EU regime operates through multiple channels, with different time horizons and different evaluative standards^{1,2}.

This multidimensional reading is also necessary because the EU regime itself is cumulative and internally differentiated. By the end of 2025, the Union had adopted nineteen packages of sanctions against Russia, and the later packages were no longer confined to headline listings or symbolic political signalling, but increasingly targeted energy, finance, military-industrial supply chains, special economic zones, vessels, third-country banks, crypto providers, and facilitators. That evolution matters analytically because it shows that the regime has moved from a primarily declaratory phase to a layered architecture of pressure maintenance, anti-circumvention, and capability denial. Once sanctions are understood as an expanding system of mutually reinforcing controls, the question “did they work?” becomes too crude to be useful. The more serious question is which strategic function each layer was meant to perform and whether that function has been delivered. In that sense, effectiveness must be disaggregated before it can be judged. Only then can the analyst distinguish limited coercion from strong degradation, or modest immediate impact from significant longer-term leverage^{3,4,5}.

The first and narrowest category is coercive effectiveness, understood as the capacity of sanctions to induce a direct and relatively rapid change in the target state’s core political behaviour. By that strict standard, the EU sanctions regime against Russia has shown only limited success. Russia did not reverse its war policy in response to the measures introduced after February 2022, and the literature remains cautious about claims that sanctions can reliably force such reversal against a large, resource-based, highly securitised authoritarian state. The broader sanctions literature has long noted the inconclusive evidential basis for strong coercive claims, especially where the target can absorb costs, shift burdens internally, and cultivate alternative external channels. Recent work on Russia specifically

¹ European Commission. (n.d.). *Overview of sanctions and related resources*.

² Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*.

³ Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.

⁴ European Commission. (2025, October 23). *EU adopts 19th package of sanctions against Russia*.

⁵ Council of the European Union. (n.d.). *Timeline — EU sanctions against Russia*.

reaches a similar conclusion: sanctions are an important tool of economic statecraft, but not a magic instrument for ending wars or mechanically changing state behaviour. A serious judgement must therefore reject the inflationary claim that sanctions failed merely because they did not produce immediate capitulation. It must instead recognise that direct coercion is only one benchmark, and not necessarily the most realistic one in this case^{1,2}.

At the same time, even coercive effectiveness should not be defined too mechanically. In a war setting, coercion may also consist in narrowing the target's room for manoeuvre, raising the price of continuation, and worsening the terms on which the target can finance, equip, insure, transport, and legally service its war effort. The official EU framing increasingly reflects that broader logic: recent packages explicitly aim to increase pressure on the Russian war economy and diminish Russia's ability to wage its war of aggression, not merely to produce an instantaneous declaration of retreat. This is analytically significant because it places the regime closer to sustained coercive pressure than to a one-off ultimatum. The relevant standard is therefore not binary capitulation, but whether the target can continue the conflict on the same economic, technological, and institutional terms as before. On that broader definition, coercion remains limited but not absent. The regime has not compelled reversal, but it has contributed to making continuation more costly, more complex, and more dependent on narrower channels of adaptation^{3,4}.

The second category is degradational effectiveness, and here the evidence is considerably stronger. Across the economic, legal, hybrid, and compliance tracks examined in this report, the EU regime has been materially more effective at degrading capabilities than at forcing immediate political reversal. Official EU trade data show the scale of dislocation: EU exports to Russia fell from EUR 89.2 billion in 2021 to EUR 31.5 billion in 2024, while total trade collapsed from EUR 252.8 billion to EUR 67.5 billion over the same period. The same data show especially sharp contraction in machinery and transport equipment exports, one of the most relevant categories for industrial and technological reproduction. This degradational logic has been reinforced by the Common High Priority Items framework, the due-diligence guidance for operators, and the growing focus on battlefield-relevant technologies and diversion-sensitive goods. External analytical work has likewise concluded that sanctions and export controls have placed sustained stress on Russia's defence-industrial base and forced more attritional, lower-quality patterns of reproduction. The correct conclusion is not that Russia lost all productive capacity, but that the cost, friction, and quality constraints of reproduction have increased materially^{5,6,7}.

Degradational effectiveness is visible not only in trade and technology, but also in the restructuring of energy and external commercial relations. The EU's dependency on Russian gas fell from 45% of overall imports at the beginning of the war to 12% in 2025, while oil imports shrank from 27% at the beginning of 2022 to 2%. Eurostat also records a profound change in the wider pattern of EU energy trade: Russia's share in EU energy imports fell from 27.3% in the first quarter of 2020 to 3.6% in the fourth quarter of 2025. This does not mean that Russia ceased exporting hydrocarbons globally, but it does mean that one of its historically important commercial and infrastructural relationships with Europe was deeply and structurally disrupted. The oil price cap and shadow-fleet-related measures further reduced relevant Russian revenues, with the Council stating in May 2025 that such revenues had fallen by EUR 38 billion and were materially below March 2022 levels. From the standpoint of sanctions analysis, this is not full strangulation, but it is unmistakable degradation. The target can adapt, reroute, and partially

¹ Smeets, M. (2018). *Can economic sanctions be effective?*

² Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*.

³ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

⁴ European Commission. (2025, February 24). *EU adopts 16th package of sanctions against Russia*.

⁵ European Commission, Directorate-General for Trade and Economic Security. (2025, May 8). *European Union, Trade with Russia*.

⁶ European Commission. (2024, February 22). *List of common high priority items*.

⁷ Bergmann, M., Snegovaya, M., Dolbaia, T., & Fenton, N. (2023). *Out of Stock? Assessing the Impact of Sanctions on Russia's Defense Industry*.

compensate, yet it does so under worse commercial conditions, greater logistical stress, and lower policy flexibility than before^{1,2,3}.

The third category is deterrent effectiveness, and this must be disaggregated very carefully. If deterrence is defined as preventing the initial 2022 escalation, then the answer is plainly negative. But that is not the only relevant meaning. Deterrence may also operate at the level of third-country facilitators, insurers, banks, freight operators, brokers, compliance departments, and technology suppliers who decide that the legal, reputational, or enforcement risk of Russia-linked activity has become too high. In that narrower but operationally important sense, sanctions can deter not the Kremlin's original decision, but the willingness of surrounding actors to service, enable, or normalise that decision. Recent Commission and G7 guidance documents are explicitly designed to produce exactly this effect by identifying red flags, evasion typologies, and due-diligence expectations for industry. The new EU criminal-law framework for sanctions violations also strengthens the deterrent back end by making circumvention and violation more prosecutable across Member States. Accordingly, deterrence in the Russia case should be treated as mixed: strategically weak at the level of pre-war prevention, but more substantial at the level of ongoing transaction restraint and facilitation risk^{4,5,6}.

The fourth category is coordinative effectiveness, and in the EU case this has been one of the regime's clearest strengths. Sanctions have functioned not only as a pressure device against Russia, but also as an instrument for maintaining policy alignment across Member States and between the EU and partner jurisdictions. The legal adoption process itself requires coordinated institutional action, while the practical operation of the regime increasingly depends on shared guidance, common risk typologies, joint lists of sensitive goods, and convergent implementation practice. The Commission's publication of updated G7 guidance for industry, together with the European Parliament's emphasis on implementation and monitoring capacity, illustrates that sanctions are now a field of coalition management as much as a field of restriction. This is important because coalitional coordination is not merely symbolic; it amplifies the practical force of measures in finance, insurance, export control, and anti-circumvention. A measure that is modest in one jurisdiction can become materially stronger when embedded in a wider network of aligned controls. In that sense, the sanctions regime has helped convert political solidarity into an operational architecture of coordinated restraint^{7,8,9}.

A closely related but distinct category is legitimising effectiveness. Sanctions do not merely restrict transactions; they also encode a normative position and prevent the normalisation of relations under wartime conditions. The EU's official sanctions pages repeatedly present restrictive measures as a core instrument of the Union's Common Foreign and Security Policy, designed to respond to harmful conduct and sustain pressure until that conduct changes. This normative function matters because the durability of sanctions depends not only on technical enforceability, but on the continued legitimacy of the regime within the sender coalition. In the Russian case, sanctions have helped maintain a structured European position that the war cannot be treated as a normal background condition of business. They have also supported the broader policy logic of long-term assistance to Ukraine, including the channelling of extraordinary proceeds from immobilised Russian assets into EU-G7 support mechanisms. The result is a regime that legitimises not only pressure on Russia, but also the non-automatic restoration of ordinary

¹ European Commission. (2026, February 2). *REPowerEU — phase out of Russian energy imports*.

² Eurostat. (n.d.). *EU international trade in goods — latest developments*.

³ Council of the European Union. (2025, May 20). *Russia's war of aggression against Ukraine: EU agrees 17th package of sanctions*.

⁴ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*.

⁵ European Union. (2024, April 24). *Directive (EU) 2024/1226 on the definition of criminal offences and penalties for the violation of Union restrictive measures*.

⁶ European Commission. (2024, September 24). *Sanctions vis-à-vis Russia: Commission publishes G7 Industry Guidance on preventing sanctions evasion*.

⁷ European Commission. (n.d.). *Overview of sanctions and related resources*.

⁸ European Commission. (2024, September 24). *Preventing Russian export control and sanctions evasion — Updated guidance for industry*.

⁹ Portela, C., & Olsen, K. B. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*.

interaction. That function should not be dismissed as merely symbolic, because in long-duration confrontations legitimacy is one of the conditions of policy endurance^{1,2,3}.

The sixth category, and perhaps the most underappreciated in public discourse, is institutional effectiveness. Over the period covered by this report, the sanctions regime has increasingly become a field of European governance in its right, with its helpdesk infrastructure, guidance architecture, common criminal-law framework, implementation routines, and enforcement-support instruments. That development matters because a sanctions regime becomes strategically durable not when it is loudly announced, but when it acquires administrative depth, legal clarity, and repeatable operational routines. The EU Sanctions Helpdesk, launched in 2025 for SMEs and other operators, is an example of this institutional thickening. So too is the 2024 Directive on sanctions violations, which establishes common definitions of criminal offences and penalties in this area. Even infringement action against lagging transposition has significance here, because it shows that sanctions governance has moved from exceptional improvisation towards more regularised internal discipline. Institutional effectiveness therefore consists in the regime's growing capacity to reproduce itself, standardise expectations, and remain governable over time^{4,5,6}.

This institutional dimension also changes how effectiveness should be measured. In a mature sanctions' regime, outcomes are produced not only by regulations themselves, but by the interaction between legal drafting, interpretative FAQs, compliance guidance, due-diligence standards, licensing practice, reporting channels, and enforcement follow-through. The growing volume of Commission guidance on Russia-related provisions, including targeted-vessel rules, oil imports, due diligence for Common High Priority items, infrastructure bans, and services questions, demonstrates that the regime now operates through a dense interpretative layer rather than through bare prohibitions alone. That interpretative layer is not secondary. It is one of the main channels through which sanctions become administratively usable and commercially consequential. As Parts Five, Six, and Seven of this report have shown, the legal, hybrid, and compliance tracks are therefore not marginal annexes to "real" sanctions, but constitutive parts of how pressure is actually transmitted. A regime that becomes better interpreted, better monitored, and better institutionalised may become more effective even without dramatic new headline measures^{7,8,9}.

A multidimensional approach also requires a temporal distinction between short-term shock, medium-term restructuring, and long-term erosion. Some sanctions effects appear quickly: financial dislocation, transactional uncertainty, withdrawal of services, immediate compliance friction, and abrupt trade interruption. Others emerge only gradually, through the ageing of capital stock, weaker technological renewal, reduced quality of imported substitutes, longer logistics chains, narrowing of insurance and finance options, and the cumulative effects of risk pricing. The analytical literature on sanctions repeatedly stresses that assessment becomes distorted when all effects are forced into an immediate behavioural frame. This is particularly true in the Russian case, where a degree of macroeconomic stabilisation has coexisted with deeper structural frictions and more constrained future option sets. Time therefore matters not only descriptively but conceptually. A measure that appears disappointing in

¹ European Commission. (n.d.). *Overview of sanctions and related resources*.

² European Commission. (2025, February 24). *EU adopts 16th package of sanctions against Russia*.

³ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

⁴ European Commission. (2025, June 11). *Sanctions implementation*.

⁵ European Commission. (2026, January 27). *Real SMEs, real sanctions compliance stories*.

⁶ European Union. (2024, April 24). *Directive (EU) 2024/1226 on the definition of criminal offences and penalties for the violation of Union restrictive measures*.

⁷ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.

⁸ European Commission. (n.d.). *Guidance documents*.

⁹ European Commission. (2025, July 23). *Commission takes action to ensure complete and timely transposition of the Directive on the criminalisation of the violation of Union restrictive measures*.

the short term may still be meaningful when judged against medium-term degradation and long-term strategic leverage^{1,2,3}.

This temporal logic is also why visible Russian adaptation cannot be treated as proof of sanctions irrelevance. Adaptation may certainly indicate resilience, but it may equally indicate costly re-routing, lower-quality substitution, greater reliance on opaque intermediaries, or stronger dependence on a narrower group of external partners. The existence of sanction-busting or alternative trade relations has been recognised in the literature for years, yet this does not negate pressure; rather, it changes the form in which pressure becomes visible. In the Russian case, the EU and G7 have responded precisely because circumvention is real: they have issued due-diligence guidance, red-flag typologies, and updated industry guidance aimed at diversion-sensitive transactions. In other words, adaptation is part of the sanctions field, not evidence that the field has disappeared. The more Russia relies on workaround structures, the more the contest shifts from simple prohibition to monitoring, closure, and cost escalation. That is a different kind of effectiveness problem, but not a null one^{4,5,6}.

Another reason the binary formula fails is that it places undue weight on aggregate macroeconomic resilience. Russia's economy did not collapse in the way some early commentary implied, and recent economic analysis has stressed the mixed character of sanctions impact. But that fact alone does not settle the question of sanctions effectiveness. A war economy can remain operational while becoming less efficient, more coercively redistributive, more technologically constrained, and more dependent on inferior or riskier channels of reproduction. Official EU trade data and energy data show that the Union-Russia economic relationship has been radically compressed even without total economic breakdown in Russia. The relevant analytical contrast is therefore not “collapse versus no collapse”, but “continued functioning under substantially worsened structural conditions versus continued functioning on pre-war terms”. On that test, the sanctions' regime has clearly altered the environment in which Russia operates, even if it has not extinguished Russian wartime capacity altogether^{7,8,9}.

This implies that sanctions evaluation should use differentiated indicators matched to differentiated functions. Political and diplomatic measures should be judged in terms of signalling, isolation, and coalition management. Economic measures should be judged by capability denial, trade compression, revenue pressure, technological degradation, and transaction-cost escalation. Social measures require caution and should be assessed largely through mediated and distributional effects rather than crude moral claims. Legal measures should be evaluated by precision, defensibility, proportionality, and resilience under review. Hybrid measures should be judged by their ability to disrupt enabling networks, intermediary jurisdictions, logistics, and facilitation infrastructures. Compliance measures should be judged by transmission quality, due diligence, private-sector uptake, and the reduction of exploitable grey zones. Once this evaluative grammar is adopted, the false simplicity of “worked / did not work” becomes analytically untenable^{10,11,12}.

¹ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*.

² Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*.

³ Smeets, M. (2018). *Can economic sanctions be effective?*

⁴ Ibid.

⁵ European Commission. (2024, September 24). *Preventing Russian export control and sanctions evasion — Updated guidance for industry*.

⁶ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*.

⁷ Ibid.

⁸ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*.

⁹ European Commission, Directorate-General for Trade and Economic Security. (2025, May 8). *European Union, Trade with Russia*.

¹⁰ Portela, C., & Olsen, K. B. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*.

¹¹ European Commission. (2025, June 11). *Sanctions implementation*.

¹² European Commission. (2025, July 23). *Commission takes action to ensure complete and timely transposition of the Directive on the criminalisation of the violation of Union restrictive measures*.

Table 8.1.1-1. Analytical matrix of sanctions effectiveness categories in the EU regime against Russia (2022–2025)

Effect category	What counts as success	Main EU-Russia channels	Interim judgement
Coercive	Direct change in Russia’s core war policy	Political signalling, listings, sectoral pressure, cumulative cost escalation	Limited in the narrow sense; partial only in the broader “pressure on continuation” sense
Degradational	Erosion of capabilities, access, and reproduction quality	Export controls, finance, energy, services, logistics, technology denial	Stronger than coercive effect; one of the clearest results of the regime
Deterrent	Discouraging prohibited or high-risk conduct	Compliance burdens, due diligence, criminal penalties, red-flag guidance, de-risking	Mixed overall; weak at pre-war deterrence, stronger for facilitators and operators
Coordinative	Maintaining coalition coherence and operational alignment	Packages, G7 guidance, common priority lists, shared implementation logic	Strong
Legitimising	Sustaining the normative and political basis of pressure	CFSP framing, Ukraine support, non-normalisation of wartime relations	Strong
Institutional	Building durable governance capacity for sanctions	FAQs, Helpdesk, criminalisation directive, enforcement routines, compliance systems	Strong and increasingly important

Authorship: prepared by the author on the basis of official EU institutional materials and other works

Sources:

- European Commission. (n.d.). *Overview of sanctions and related resources*.
- Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.
- European Commission, Directorate-General for Trade and Economic Security. (2025, May 8). *European Union, Trade with Russia*.
- Portela, C., & Olsen, K. B. (2023, October). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions*.
- Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*.
- Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*.

Table 8.1.1-1 makes clear that the various effect categories should not be weighted equally. If one uses only the most demanding criterion of rapid coercion, the entire regime appears disappointing. If, however, one evaluates the regime according to the full set of functions it was actually designed to perform by 2022–2025, a more differentiated conclusion emerges. The strongest results lie in degradation, coordination, legitimisation, and institutionalisation; deterrence is mixed; narrow coercion remains limited. That is not a rhetorical compromise but an analytically more accurate judgement. It better reflects both the official EU design logic and the accumulated evidence on trade compression, energy reorientation, compliance thickening, and anti-circumvention governance. The regime has not produced a quick breakthrough, but neither can it be meaningfully described as ineffective^{1,2,3,4}.

The overall analytical conclusion of this subsection is therefore straightforward. The EU sanctions regime against Russia should be assessed as a multi-dimensional pressure architecture whose main successes to date lie in capability degradation, coalition coordination, normative-legitimising

¹ Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.

² European Commission, Directorate-General for Trade and Economic Security. (2025, May 8). *European Union, Trade with Russia*.

³ European Commission. (2025, June 11). *Sanctions implementation*.

⁴ European Union. (2024, April 24). *Directive (EU) 2024/1226 on the definition of criminal offences and penalties for the violation of Union restrictive measures*.

consolidation, and the institutional maturation of sanctions governance, while its principal weakness remains the limited capacity of sanctions alone to compel rapid political reversal in Moscow. This conclusion also provides the necessary bridge to the next subsection. Once effectiveness is treated as differentiated rather than binary, the next task is not to ask again whether sanctions “worked”, but to compare how strongly they performed across the six substantive dimensions examined in this report: political, economic, social, legal, hybrid, and compliance. Only that comparative step can yield a properly integrated final judgement on the regime as a whole^{1,2,3}.

8.1.2. Comparative Assessment across the Six Dimensions of the Report

A comparative assessment across the six dimensions of this report confirms that the EU sanctions regime against Russia has not been uniform in either mechanism or outcome. The central analytical result is that the regime has produced its strongest effects where it targets capabilities, transactions, implementation pathways, and enabling networks, while it has been less decisive where the expected result would be rapid political reversal or socially transformative pressure on the Russian population as such. This means that the overall judgement cannot be derived from any single track. Political, economic, social, legal, hybrid, and compliance measures each perform different strategic functions and therefore require differentiated evaluative standards. The political track has been strongest in signalling, delegitimisation, and coalition discipline; the economic track in degradation and structural pressure; the social track in mediated friction rather than direct coercion; the legal track in resilience, precision, and institutional durability; the hybrid track in raising the cost of adaptation; and the compliance track in converting formal law into real constraints. The comparative conclusion is thus not that some tracks matter and others do not, but that they matter in different ways and with different time horizons. Any serious integrated judgement must therefore rank them not by rhetorical visibility, but by the type and strength of strategic effect they actually generated^{4,5}.

The political dimension should be assessed first because it was the initial and most publicly legible layer of the regime. By March 2026, the EU’s individual listings in response to Russia’s aggression covered around 2,600 individuals and entities, while the wider sanctions regime also included diplomatic measures, the suspension of visa facilitation, and broadcasting restrictions on a range of Russian media outlets. These measures did not compel a reversal of Russian foreign policy in the narrow sense. However, they performed several other functions with considerable consistency: they narrowed Russia’s legitimate room for manoeuvre in Europe, codified a durable posture of non-normalisation, marked responsibility, and helped stabilise intra-EU and broader coalition discipline. In comparative terms, the political track was therefore not the strongest in direct coercive yield, but it was one of the strongest in coordinative and legitimising effect. It provided the normative and diplomatic frame within which the other tracks could operate. Its practical weakness remained the familiar one: political signalling alone rarely forces behavioural reversal in a large authoritarian wartime system with high coercive capacity and alternative channels of external alignment^{6,7,8}.

This means that the political track should be graded as strong in symbolic-coordinative terms but limited in direct coercive terms. That is not a contradiction but a normal feature of mature sanctions regimes. Political measures are often designed less to produce immediate surrender than to establish a durable external position, delimit legitimacy, and sustain policy continuity across changing circumstances. In

¹ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*.

² Portela, C., & Olsen, K. B. (2023, October). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions*.

³ Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.

⁴ Ibid.

⁵ European Commission. (n.d.). *Overview of sanctions and related resources*.

⁶ Council of the European Union. (2026, March 14). *Russia’s war of aggression against Ukraine: EU extends individual listings over Ukraine’s territorial integrity for a further six months*.

⁷ Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.

⁸ Council of the European Union. (n.d.). *EU sanctions in response to Russia’s military aggression against Ukraine*.

the EU-Russia case, that function was especially important because the regime expanded over time into nineteen packages, and later measures relied on a prior political consensus that the relationship could not return to routine business under wartime conditions. The political dimension was therefore foundational even where it was not decisive on its own. In comparative ranking, it belongs above the social track and broadly alongside the legal track in strategic importance, but below the economic and compliance tracks in terms of direct operational pressure. Its strongest value lay in preserving the political coherence of the sanctions' architecture as a whole^{1,2}.

The economic dimension, by contrast, was the clearest source of material degradational effect. Official EU trade data show that total EU-Russia trade fell to EUR 67.5 billion in 2024, with EU imports from Russia at EUR 36.0 billion and EU exports to Russia at EUR 31.5 billion. These figures represent a dramatic contraction compared with pre-war levels and demonstrate that the economic relationship has been structurally compressed rather than merely politically criticised. The same pattern is visible in sectoral composition, with major pressure on machinery, transport equipment, advanced goods, and other categories linked to technological renewal and productive reproduction. The EU and G7 policy line has increasingly aimed not only to reduce immediate flows, but to deny Russia access to critical technologies, services, and market conditions necessary for sustaining a modern war economy at lower cost. In comparative terms, the economic track produced the strongest direct pressure on Russia's external economic interface. It did not collapse the Russian economy, but it significantly worsened the conditions under which Russia can finance, import, transport, insure, and technologically reproduce its wartime system^{3,4}.

The energy component of the economic track reinforces this conclusion. The Commission's REPowerEU material states that the EU reduced its dependence on Russian gas from 45% at the start of the war to 12% in 2025, while oil imports from Russia fell from 27% at the beginning of 2022 to 2%. Eurostat likewise records a broader structural change in EU energy trade, with Russia's share in EU energy imports dropping from 27.3% in the first quarter of 2020 to 3.6% in the fourth quarter of 2025. The Council also reported in May 2025 that, since the oil price cap and shadow-fleet sanctions were introduced, relevant Russian revenues had decreased by EUR 38 billion. None of these figures proves complete economic strangulation. But together they show that the economic track has been the most effective in forcing large-scale reconfiguration of trade, energy dependence, and revenue channels. In comparative assessment, it therefore ranks first in observable degradational effect, even though adaptation, rerouting, and alternative buyers prevented a simple coercive breakthrough^{5,6,7}.

The social dimension occupies a distinctly different place in the comparative hierarchy. The EU did introduce measures with visible social implications, including the full suspension of the EU-Russia visa facilitation agreement and the suspension of broadcasting activities of a number of Russian state-controlled or pro-Kremlin media outlets. Yet the report's central finding on this track remains that social effects are largely mediated, distributional, and indirect, not direct instruments of coercive transformation. The Commission's humanitarian sanctions guidance explicitly states that EU sanctions are targeted and are intended to reduce adverse humanitarian consequences as far as possible. That principle is critical for understanding why the social track cannot be evaluated by the same standard as the economic one. The EU has not pursued comprehensive societal deprivation as a legitimate objective. Instead, the social dimension operates through mobility friction, reduced access to certain cross-border conveniences, everyday financial and service obstacles, symbolic exclusion, and the redistribution of burdens within Russian society. Comparative assessment therefore places the social

¹ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

² Council of the European Union. (n.d.). *Timeline — Packages of sanctions against Russia since February 2022*.

³ European Commission, Directorate-General for Trade and Economic Security. (2025, May 8). *European Union, Trade with Russia*.

⁴ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

⁵ European Commission. (2026, February 2). *REPowerEU — phase out of Russian energy imports*.

⁶ Eurostat. (n.d.). *EU international trade in goods — latest developments*.

⁷ Council of the European Union. (2025, May 20). *Russia's war of aggression against Ukraine: EU agrees 17th package of sanctions*.

track at the lower end of direct strategic yield, while still recognising that it contributes to the wider atmosphere of constrained normality^{1,2,3}.

The relative weakness of the social track does not mean that it is analytically irrelevant. On the contrary, it is important precisely because it demonstrates the limits of sanction acceptability and the risks of overreach. Social sanctions are constrained by humanitarian, fundamental-rights, and proportionality considerations to a far greater degree than asset freezes, export controls, or anti-circumvention rules. They can also generate counterproductive narratives if they appear indiscriminate, culturally punitive, or detached from identifiable state-linked responsibility. The European Parliament's sanctions implementation work has underlined that sanctions policy is not cost-free for the EU and its Member States and that implementation quality matters for avoiding inequitable or distorted effects. For this reason, the social track should be judged as low to medium in direct pressure, but high in caution value: it tells policymakers where legitimacy thresholds lie and where the sanctions regime must remain disciplined if it is to preserve political sustainability inside the Union. In comparative terms, it is the most normatively constrained and the least decisive of the six dimensions^{4,5}.

The legal dimension should be assessed more favourably than its public visibility might suggest. Its strategic importance lies not in spectacular headline effects, but in whether the overall regime remains normatively precise, scalable, defensible, and administratively governable over time. The adoption of Directive (EU) 2024/1226 on the definition of criminal offences and penalties for the violation of Union restrictive measures significantly strengthened the Union's legal back end by making sanctions violations easier to investigate and prosecute across Member States. At the same time, the Commission's continuously updated Russia sanctions FAQs and sectoral guidance on services, finance, energy, infrastructure, targeted vessels, and due diligence have thickened the interpretative layer necessary for day-to-day legal usability. In comparative terms, the legal track has therefore been strong in resilience and institutional quality, even if its coercive effect is generally indirect and mediated through the other tracks. It provides the framework within which political intention becomes enforceable and economic restrictions become operationally intelligible. Without that legal architecture, the wider sanctions regime would become harder to defend, harder to apply consistently, and easier to circumvent^{6,7,8}.

At the same time, the legal track also reveals one of the regime's structural weaknesses: complexity. The more the sanctions regime evolves into a dense set of prohibitions, derogations, authorisation pathways, service restrictions, vessel measures, and anti-circumvention obligations, the more it depends on high-quality interpretation and convergent national administration. The European Parliament and EPRS have both emphasised the risk created by the EU's decentralised implementation structure, including a mosaic of practices across the Union and large numbers of competent authorities. This means that the legal dimension, while strong in formal architecture, cannot be treated as self-executing. Its effectiveness depends on translation into compliance systems and enforcement routines. Comparative assessment therefore places the legal track below the economic track in direct observable effect, but above the social track and close to the political track in strategic significance. Its strongest contribution is to the durability of the regime rather than to immediate behavioural shock^{9,10}.

¹ Council of the European Union. (2022, September 9). *Council adopts full suspension of visa facilitation with Russia*.

² Council of the European Union. (n.d.). *EU sanctions in response to Russia's military aggression against Ukraine*.

³ European Commission. (2023, February 7). *Humanitarian aid — Frequently asked questions*.

⁴ European Parliament. (2023, October 10). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*.

⁵ European Commission. (2023, February 7). *Humanitarian aid — Frequently asked questions*.

⁶ European Union. (2024, April 24). *Directive (EU) 2024/1226 of the European Parliament and of the Council on the definition of criminal offences and penalties for the violation of Union restrictive measures*.

⁷ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.

⁸ European Commission. (2026, January 22). *Provision of services*.

⁹ European Parliament. (2023, October 10). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*.

¹⁰ European Parliamentary Research Service. (2024). *EU sanctions: A key foreign and security policy instrument*.

The hybrid dimension, as examined in Part Six, ranks among the most strategically significant but also among the most difficult to measure. Its importance lies in targeting the adaptive infrastructures that help Russia function under sanctions pressure: shadow shipping, intermediary jurisdictions, concealed ownership, service fragmentation, trade diversion, and other network-based forms of circumvention or operational substitution. The Council's explanatory material on sanctions against Russia explicitly identifies the shadow fleet's evasive tactics, including the switching off of tracking systems, false flags, and complex ownership structures, and notes that the EU began addressing these circumvention risks in the 11th and 12th packages before expanding the approach further. The same logic is visible in the Union's separate sanctions framework on Russia's destabilising and hybrid activities. In comparative terms, the hybrid track has been more effective in raising adaptation costs than in closing all adaptation routes. It is therefore a medium-high performing dimension: operationally important, increasingly central, but still limited by evidentiary opacity, attribution challenges, and the resilience of proxy and intermediary networks^{1,2,3}.

This hybrid assessment is important because it helps explain why the regime's most meaningful effects are not always captured by straightforward macro indicators. Hybrid sanctions often work through friction, delay, opacity reduction, network disruption, and the forced multiplication of workarounds. These effects may be less visible than aggregate trade contraction, but they are strategically relevant because they shape the quality, scalability, and cost of Russian adaptation. The Commission's enhanced due-diligence guidance for EU operators and its more recent issue-specific FAQ architecture on Common High Priority items, targeted vessels, and infrastructure bans illustrate that the EU increasingly understands the contest as one over enabling systems, not only over enumerated goods. In comparative terms, the hybrid dimension does not outrank the economic track in scale, but it increasingly rivals it in strategic sophistication. Its contribution lies in preventing adaptation from becoming too stable, too cheap, or too invisible^{4,5,6}.

The compliance dimension should be treated as one of the highest-performing and most indispensable tracks in the report. Its comparative strength lies in the fact that it is not merely another category of measures, but the transmission mechanism through which the legal, economic, and hybrid dimensions become real constraints on behaviour. The Commission's sanctions implementation work in 2025 explicitly presented the EU Sanctions Helpdesk as part of the Union's effort to help operators, especially SMEs, comply with sanctions worldwide. The continuously updated consolidated FAQs, the due-diligence materials, and the criminalisation directive all point in the same direction: sanctions policy has matured into a governance system that relies heavily on operator screening, ownership verification, export diligence, payment controls, documentation, and internal escalation procedures. Comparative assessment therefore places the compliance track alongside the economic track at the top tier of practical effectiveness, though for a different reason. Economic sanctions create the material restriction; compliance determines whether that restriction is actually transmitted, internalised, and enforced across thousands of decisions by private and public actors^{7,8,9}.

The limitation of the compliance track is not conceptual but administrative. The European Parliament's work on sanctions implementation has stressed the need for stronger EU capacities, better guidance, clearer competent-authority structures, and more systematic monitoring. This is consistent with the

¹ Council of the European Union. (n.d.). *EU sanctions against Russia: questions and answers*.

² Council of the European Union. (n.d.). *Russia's hybrid activities: EU sanctions*.

³ Council of the European Union. (2025, October 3). *Russian hybrid threats: Council prolongs restrictive measures by another year*.

⁴ European Commission. (2023, September 7). *Sanctions: Commission publishes guidance to help European operators assess sanctions circumvention risks*.

⁵ European Commission. (2024, February 19). *Guidance on due diligence*.

⁶ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.

⁷ European Commission. (2025, June 11). *Sanctions implementation*.

⁸ European Commission. (2026, March 13). *Consolidated version of the frequently asked questions concerning sanctions adopted following Russia's military aggression against Ukraine and Belarus' involvement in it*.

⁹ European Union. (2024, April 24). *Directive (EU) 2024/1226 of the European Parliament and of the Council on the definition of criminal offences and penalties for the violation of Union restrictive measures*.

report’s conclusion in Part Seven that compliance quality can be undermined by fragmentation, defensive de-risking, weak ownership transparency, operator asymmetries, and uneven enforcement resources across Member States. Compliance is thus one of the strongest tracks in comparative assessment, but it is also one of the most demanding. Its success depends on continuous updating, institutional learning, data access, and practical convergence. However, in relative terms, it still outperforms the political and social tracks because it directly affects whether sanctioned conduct becomes difficult, risky, and expensive in practice^{1,2}.

Taken together, the six-track comparison yields a clear ordering. The economic and compliance dimensions emerge as the strongest in practical operational effect. The hybrid and legal dimensions follow closely behind, not because they are secondary, but because much of their value lies in reinforcing, hardening, and extending the main lines of pressure rather than replacing them. The political dimension remains indispensable in symbolic, coordinative, and legitimising terms, yet weaker in direct coercion. The social dimension remains the most limited in direct strategic return and the most heavily constrained by legitimacy considerations. Such a ranking should not be misunderstood as a hierarchy of importance detached from interaction. It is precisely the interaction of these tracks that gives the EU regime its cumulative strength. But if one asks, dimension by dimension, where the most pronounced effects have occurred, where they have been mediated, and where they have remained limited, this is the comparative pattern that emerges^{3,4,5}.

The main analytical implication of Table 8.1.2-1 is that the report’s six dimensions do not merely describe different policy sectors; they identify different effect pathways within a single cumulative regime. The political track gives the regime legitimacy and diplomatic continuity. The economic track imposes the largest directly observable material losses. The social track marks the outer boundary of acceptable pressure. The legal track preserves coherence, defensibility, and repeatability. The hybrid track prevents adaptation from stabilising too cheaply. The compliance track determines whether all of the above remain more than paper rules. A comparative assessment is therefore not an exercise in choosing one “true” dimension, but in identifying which dimensions carry the greatest analytical weight at different stages of the pressure cycle. On that basis, the strongest short-to-medium-term weight lies in the economic and compliance tracks, while the legal and hybrid tracks are decisive for medium-term hardening and the political track remains essential for long-term durability^{6,7,8}.

Table 8.1.2-1. Comparative assessment of the six sanctions dimensions examined in the report

Dimension	Dominant mechanism of effect	Where the effect has been most visible	Principal limitation	Comparative judgement
Political	Signalling, delegitimation, diplomatic narrowing, coalition coordination	Listings, visa suspension, media restrictions, non-normalisation of relations	Weak capacity for rapid direct coercion	Strong in coordinative and legitimising terms; limited in direct coercive terms
Economic	Capability denial, trade compression, energy decoupling, revenue pressure	Trade contraction, technology restrictions, energy reorientation, oil-revenue pressure	Adaptation, rerouting, alternative buyers and suppliers	Strongest direct degradational dimension

¹ European Parliament. (2023, October 10). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions.*

² European Commission. (n.d.). *Overview of sanctions and related resources.*

³ Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions.*

⁴ European Commission, Directorate-General for Trade and Economic Security. (2025, May 8). *European Union, Trade with Russia.*

⁵ European Commission. (2025, June 11). *Sanctions implementation.*

⁶ European Commission. (n.d.). *Overview of sanctions and related resources.*

⁷ Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions.*

⁸ European Parliament. (2023, October 10). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions.*

Dimension	Dominant mechanism of effect	Where the effect has been most visible	Principal limitation	Comparative judgement
Social	Indirect social friction, mobility barriers, symbolic exclusion, mediated everyday constraints	Visa regime changes, media restrictions, service and financial inconveniences	High legitimacy thresholds, humanitarian and proportionality constraints	Lowest direct strategic yield; analytically important but coercively limited
Legal	Normative precision, codification, defensibility, scalable governance	Criminalisation of violations, service restrictions, FAQs, licensing and derogation architecture	Complexity, litigation risk, uneven national administration	Strong in resilience and durability; indirect in immediate pressure
Hybrid	Network disruption, anti-circumvention, route destabilisation, opacity reduction	Shadow-fleet measures, intermediary-jurisdiction controls, due-diligence intensification	Attribution difficulties, proxy structures, evidentiary opacity	Medium-high; strategically important and increasingly central
Compliance	Transmission of law into behaviour through screening, due diligence, and controls	Operator uptake, beneficial-ownership checks, trade controls, payment and insurance controls	Fragmentation, uneven enforcement capacity, private-sector burden	Top-tier practical effect; indispensable enabling dimension

Authorship: prepared by the author on the basis of official EU institutional materials

Sources:

- Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.
- European Commission, Directorate-General for Trade and Economic Security. (2025, May 8). *European Union, Trade with Russia*.
- European Commission. (2025, June 11). *Sanctions implementation*.
- European Union. (2024, April 24). *Directive (EU) 2024/1226 of the European Parliament and of the Council on the definition of criminal offences and penalties for the violation of Union restrictive measures*.
- European Parliament. (2023, October 10). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions*.
- Council of the European Union. (n.d.). *EU sanctions against Russia: questions and answers*.

The overall conclusion of this subsection is therefore as follows. Across the six dimensions analysed in Parts Two to Seven, the EU sanctions regime against Russia has been most effective where it degrades capabilities, narrows external options, hardens transaction controls, and disciplines implementation, and least effective where the expected benchmark is rapid direct coercion or broad socially transformative impact by itself. This comparative judgement also clarifies the next analytical step. Once the six dimensions are ranked according to their dominant effect, the decisive question becomes how they interact cumulatively over different time horizons. The next subsection should therefore move from comparative assessment to cumulative architecture, showing how listings, trade controls, legal restrictions, hybrid disruption, and compliance systems reinforce one another over the short, medium, and long term^{1,2,3}.

8.1.3. Cumulative Pressure, Interaction Effects, and Time Horizons

The central conclusion of this subsection is that the effectiveness of the EU sanctions regime against Russia is determined less by the isolated force of any single measure than by the cumulative interaction of multiple restrictive layers operating simultaneously and sequentially. This proposition follows directly from the analytical logic of the present report, in which sanctions have been treated not as a simple succession of political decisions, but as an integrated architecture composed of political signalling,

¹ Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.

² European Commission. (2025, June 11). *Sanctions implementation*.

³ European Commission, Directorate-General for Trade and Economic Security. (2025, May 8). *European Union, Trade with Russia*.

economic restrictions, legal controls, hybrid anti-circumvention tools, and compliance systems. In methodological terms, this means that the relevant unit of analysis is no longer the individual package or provision as such, but the pressure system created by their interaction. A listing may have only moderate effect in isolation, yet become materially more consequential when combined with asset freezes, banking restrictions, corporate de-risking, transport controls, and beneficial-ownership screening. An export control may be partially circumvented when viewed on its own, yet regain much of its practical force when reinforced by due-diligence obligations, Common High Priority items guidance, vessel targeting, and pressure on third-country facilitators. The real strategic question is therefore not whether a single sanction “works”, but whether the regime as a whole makes continuation, adaptation, and circumvention progressively more costly, legally riskier, logistically harder, and institutionally narrower over time. That cumulative reading is also consistent with recent analytical literature, which stresses that sanctions are more effective when designed and implemented comprehensively rather than piecemeal, because gradual or fragmented sequencing allows the target to adapt^{1,2}.

This cumulative logic is visible in the evolution of the EU regime itself. By October 2025, the Union had adopted nineteen packages of sanctions against Russia, and the later packages were increasingly focused not merely on enlarging the list of restrictions, but on tightening the connective tissue of the regime. The 16th package targeted vital sectors of the Russian economy; the 17th package further restricted access to battlefield technologies and targeted an unprecedented number of shadow-fleet vessels; the 18th package deepened pressure through measures against non-EU tankers in the shadow fleet and the lowering of the crude oil cap; and the 19th package expanded pressure on energy, finance, the military-industrial base, special economic zones, and enablers of the war economy. The significance of this sequence lies not only in the number of packages, but in the shift from broad restrictive expansion towards reinforcement, closure of loopholes, and better integration of sectoral, maritime, and facilitation-related measures. In other words, the EU regime has developed from a sanctions catalogue into a cumulative architecture of maintenance and hardening. That is why the later packages should be interpreted as interactional multipliers rather than merely incremental additions^{3,4,5,6}.

The first major interaction effect operates between the political and legal tracks. Political measures establish the diplomatic and normative frame of pressure, but their strategic value depends on whether they are converted into a legally intelligible and judicially sustainable set of restrictions. Listings, diplomatic restrictions, and non-normalisation signals shape the political meaning of the regime, yet without clear legal codification they remain partially declaratory. The legal track provides the precision, update capacity, derogation logic, and interpretative coherence that allow political resolve to become repeatable governance rather than episodic symbolism. This interaction is essential because a politically ambitious but legally unstable regime tends to invite litigation, divergent interpretation, and implementation hesitancy. Conversely, a legally refined regime without sufficient political will can remain narrow and under-activated. The EU regime against Russia has shown relative strength precisely where political intention and legal structuring have reinforced one another. That is one reason why later stages of the sanctions architecture increasingly relied on formal guidance, iterative FAQs, and criminal-law reinforcement rather than on symbolic announcements alone^{7,8}.

¹ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

² Giunelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

³ Council of the European Union. (2025, February 24). *Three years of Russia’s full-scale invasion and war of aggression against Ukraine: EU adopts its 16th package of economic and individual measures*.

⁴ European Commission. (2025, May 20). *EU adopts 17th package of sanctions against Russia*.

⁵ Council of the European Union. (2025, July 18). *Russia’s war of aggression against Ukraine: EU adopts 18th package of economic and individual measures*.

⁶ European Commission. (2025, October 23). *EU adopts 19th package of sanctions against Russia*.

⁷ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions*. Policy Department for External Relations.

⁸ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.

A second and even more consequential interaction effect links the economic and compliance tracks. Economic restrictions create the formal obstacle, but compliance determines whether that obstacle is actually transmitted into commercial behaviour. A trade ban without screening, end-use diligence, ownership checks, banking alerts, shipping scrutiny, and internal escalation protocols remains a weakly transmitted legal fact. This is why the report's earlier conclusion that compliance functions as the operational transmission mechanism of sanctions is so important for the integrated assessment. The European Commission's sanctions implementation material now explicitly places operator guidance, FAQs, due diligence, and Helpdesk support at the centre of sanctions practice, particularly for SMEs and other firms exposed to complex cross-border risks. The broader analytical implication is that the effectiveness of the economic track cannot be judged independently of the maturity of compliance systems. Where compliance is strong, formal restrictions become transaction-denying and behaviour-shaping; where it is fragmented, much of the nominal pressure leaks away through ambiguity, delay, or selective convenience^{1,2,3}.

The same interaction is visible in the trade data. Official Commission factsheets show that total EU-Russia goods trade fell to EUR 67.5 billion in 2024, with EU imports at EUR 35.982 billion and EU exports at EUR 31.547 billion. These aggregate figures are the visible macroexpression of a much denser architecture of restrictions, implementation, and private-sector risk processing. They do not result from one measure alone, but from the combined effect of trade prohibitions, service denials, financial constraints, transport frictions, corporate exits, ownership screening, and the wider risk environment created by sanctions governance. This is precisely why cumulative analysis is more revealing than instrument-by-instrument description. A narrow reading of one prohibition cannot explain the scale of contraction in the overall relationship; only the interaction of multiple restrictive layers can do so. The trade figures therefore should be read not as proof of the autonomous force of any single package, but as evidence of the cumulative compression produced by the regime as a whole^{4,5}.

A third interaction effect connects the economic, hybrid, and compliance dimensions in the field of anti-circumvention. Once Russia began relying more heavily on rerouting, intermediary jurisdictions, shadow logistics, proxy structures, and fragmented service chains, the centre of gravity of sanctions effectiveness shifted. It was no longer sufficient merely to prohibit the original transaction; the EU also had to disrupt the adaptive ecologies through which prohibited activity was reconstructed. This is where hybrid measures became increasingly important. Measures against the shadow fleet, targeted vessels, rerouting typologies, and high-risk facilitation structures do not replace economic sanctions; they protect and extend them by making adaptation less scalable and less predictable. At the same time, these hybrid tools depend heavily on compliance intelligence, due-diligence quality, and operator-level risk detection. Hybrid sanctions without compliance support become difficult to trace; compliance without hybrid targeting can remain too formalistic to address evolving evasion patterns. Their interaction is therefore constitutive rather than secondary^{6,7}.

This point is particularly clear in the maritime and energy domains. The EU's Russia sanctions material explains that the oil price cap functions in coordination with the Price Cap Coalition and that in July 2025 the EU lowered the crude cap from \$60 to \$47.6 per barrel. At the same time, successive packages expanded targeting of vessels involved in shadow-fleet operations, ship-to-ship transfers, identity masking, and related circumvention practices. The 17th package targeted an unprecedented number of such vessels, and the 18th package added further maritime pressure while also deepening the energy-related restrictions. These steps matter analytically because the price cap, vessel measures, and

¹ Ibid.

² European Commission. (2026, January 27). *Real SMEs, real sanctions compliance stories*.

³ European Commission. (n.d.). *Overview of sanctions and related resources*.

⁴ Ibid.

⁵ European Commission, Directorate-General for Trade and Economic Security. (2025, May 8). *European Union, Trade in goods with Russia*.

⁶ European Commission. (2025, May 20). *EU adopts 17th package of sanctions against Russia*.

⁷ Council of the European Union. (n.d.). *EU sanctions against Russia: questions and answers*.

compliance obligations do not function as substitutes; they function as mutually reinforcing controls. The cap without vessel enforcement is porous, while vessel targeting without service and price-cap enforcement risks simple substitution. Their cumulative value lies in turning Russia's energy-export adaptation into a higher-friction, higher-risk, and more governance-intensive process^{1,2,3}.

The cumulative architecture is also visible in the technology-denial field. Export controls, Common High Priority items, due-diligence rules, corporate compliance systems, partner coordination, and anti-circumvention targeting together create a pressure system that is more consequential than any one export ban standing alone. The Commission's guidance documents and FAQ architecture make clear that the Union has increasingly prioritised enhanced due diligence for operators manufacturing or trading in CHP items, while the Parliament's implementation study argues that circumvention and fragmented enforcement remain central problems. This confirms the report's earlier conclusion that the key issue is no longer simply the existence of lists of prohibited goods, but the quality of closure around the wider technology-service ecosystem. In time-horizon terms, this is crucial because technology denial typically yields only moderate short-term visibility while generating much stronger medium-term and long-term effects through ageing capital stock, reduced quality of substitution, and worsening constraints on industrial and military reproduction. A cumulative reading therefore explains why apparently modest export-control refinements may have significant delayed strategic value^{4,5,6}.

The short-term horizon should be understood primarily as the period of shock, signalling, immediate de-risking, and initial transaction disruption. In this phase, the political and financial dimensions usually dominate because they alter expectations quickly, trigger emergency legal and compliance responses, and generate immediate reassessments of counterparties, jurisdictions, and exposure. Short-term effects are therefore most visible in listings, diplomatic signalling, banking risk reactions, payment disruption, service withdrawal, and abrupt commercial hesitation. Yet short-term visibility should not be confused with total strategic weight. In the Russian case, early macroeconomic stabilisation and partial rerouting did not neutralise the regime; rather, they marked the beginning of a longer contest between restriction and adaptation. The short-term horizon is where sanctions establish credibility, produce first-order friction, and force urgent adjustments. It is not the horizon on which the total value of the sanctions' architecture can be judged^{7,8}.

The medium-term horizon is where cumulative interaction effects become more visible. This is the phase in which trade rerouting encounters higher transaction costs, energy decoupling deepens, legal and compliance systems mature, corporate and state adaptation becomes more structured, and the contest moves from immediate shock to sustained pressure maintenance. It is also the phase in which the quality of sanctions governance becomes more important than the theatricality of new announcements. The European Parliament's implementation study is especially relevant here because it shows that implementation and enforcement in the EU have relied on a decentralised system producing a mosaic of practices across more than 160 designated competent authorities. That means medium-term effectiveness depends not only on the content of sanctions, but on whether guidance, interpretation, monitoring, and enforcement converge sufficiently to reduce exploitable asymmetries. The medium

¹ Council of the European Union. (2025, July 18). *Russia's war of aggression against Ukraine: EU adopts 18th package of economic and individual measures*.

² European Commission. (2025, May 20). *EU adopts 17th package of sanctions against Russia*.

³ Council of the European Union. (n.d.). *EU sanctions against Russia: questions and answers*.

⁴ European Commission. (n.d.). *Guidance documents*.

⁵ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.

⁶ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*. Policy Department for External Relations.

⁷ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

⁸ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

term is therefore the decisive horizon for judging whether the sanctions regime is actually hardening or merely becoming more complicated^{1,2}.

The long-term horizon should be understood as one of capability erosion, investment distortion, technological degradation, institutional thickening, and altered strategic option sets. This is the horizon on which the Union's reduced energy dependence on Russia becomes most significant. According to the Commission's 2026 REPowerEU update, EU dependency on Russian gas fell from 45% at the start of the war to 12% in 2025, while oil imports shrank from 27% at the beginning of 2022 to 2%; Eurostat likewise notes that Russia's share in EU energy imports fell from 27.3% in the first quarter of 2020 to 3.6% in the fourth quarter of 2025. These are not just short-term trade adjustments. They indicate the long-duration restructuring of one of the most important external relationships in the Russian political economy. Long-term sanctions value therefore lies not only in immediate deprivation, but in the cumulative narrowing of future options, the progressive deterioration of replacement quality, and the institutional normalisation of a non-routine European posture towards Russia^{3,4}.

The time-horizon argument also clarifies why adaptation should not be misread as disproof of sanctions relevance. Adaptation is part of the same analytical field as pressure. It may demonstrate resilience, but it may also demonstrate costly substitution, increased opacity, longer logistics, more fragile service chains, heavier dependence on intermediary jurisdictions, and lower-quality technological renewal. Recent analytical work on Russia's sanctions experience makes precisely this point: sanctions imposed substantial costs, but their overall effectiveness was limited where design, timing, and enforcement allowed room for gradual adaptation. This does not negate cumulative pressure. Rather, it shows that the strategic value of sanctions depends on continuous closure, enforcement upgrading, and the prevention of stable workaround ecologies. In other words, adaptation is not evidence that cumulative architecture is irrelevant; it is evidence that cumulative architecture must remain dynamic^{5,6}.

A further interaction effect links coalition coordination with all other dimensions. The practical force of many EU measures depends on coordination with the wider Price Cap Coalition, with G7-aligned export-control regimes, and with external partners who share monitoring and enforcement priorities. The report's earlier methodological premise that EU sanctions must be read within a broader aligned architecture remains highly important here. A measure that is formally narrow in the EU legal order may become much more consequential when mirrored or reinforced across insurance, shipping, financial, and export-control networks beyond the Union. Conversely, gaps in external alignment can sharply reduce the value of otherwise robust EU drafting. Cumulative pressure is therefore not only intra-EU and inter-package; it is also transnational and inter-jurisdictional. This is one reason why the later sanctions architecture increasingly emphasised coordination, implementation, and closure rather than sheer normative proliferation^{7,8}.

At the same time, cumulative architecture does not imply unlimited linear gain from every new addition. Interaction can strengthen the regime, but it can also reveal administrative strain, interpretative overload, private-sector burden, and the risk of diminishing marginal returns. The Parliament's study explicitly warns of fragmentation, contradictory legal interpretations, and the need for better guidance and a more horizontal approach to countering circumvention. The Commission's reliance on an ever more extensive FAQ and guidance system shows that the EU is aware of this problem. The implication is

¹ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*. Policy Department for External Relations.

² European Commission. (2026, January 27). *Real SMEs, real sanctions compliance stories*.

³ European Commission. (2026, February 2). *REPowerEU — phase out of Russian energy imports*.

⁴ Eurostat. (n.d.). *EU international trade in goods — latest developments*.

⁵ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

⁶ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

⁷ Council of the European Union. (n.d.). *EU sanctions against Russia: questions and answers*.

⁸ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

that cumulative pressure works best when added measures increase closure and enforceability, not merely textual density. A sanctions regime that keeps expanding formally while becoming harder to administer may gain legal mass but lose operational sharpness. This is why cumulative architecture must be assessed qualitatively as well as quantitatively^{1,2,3}.

Table 8.1.3-1. Cumulative pressure architecture of the EU sanctions regime against Russia: interaction effects across time horizons

Time horizon	Dominant interaction logic	Main interacting instruments	Principal type of effect	Main limitation
Short term	Shock, signalling, first-order disruption	Listings, diplomatic restrictions, banking restrictions, immediate compliance responses, service withdrawal	Rapid political signalling, transaction hesitation, de-risking, initial commercial friction	Shock absorption, emergency stabilisation, rapid rerouting
Medium term	Closure, reinforcement, adaptive contest	Trade controls, CHP-item controls, due diligence, FAQs, vessel targeting, anti-circumvention tools, Helpdesk-supported compliance	Sustained trade compression, higher transaction costs, narrowing of facilitation channels, better transmission of restrictions	Fragmented implementation, uneven enforcement, intermediary adaptation
Long term	Erosion, institutionalisation, strategic narrowing	Energy decoupling, technology denial, legal criminalisation, compliance normalisation, shadow-fleet targeting, coalition coordination	Capability degradation, reduced renewal quality, lower strategic flexibility, durable European governance posture	Diminishing returns if closure stagnates, persistent external support channels, coalition fatigue

Authorship: prepared by the author on the basis of official EU institutional materials

Sources:

- Council of the European Union. (2025, February 24). *Three years of Russia’s full-scale invasion and war of aggression against Ukraine: EU adopts its 16th package of economic and individual measures.*
- European Commission. (2025, May 20). *EU adopts 17th package of sanctions against Russia.*
- Council of the European Union. (2025, July 18). *Russia’s war of aggression against Ukraine: EU adopts 18th package of economic and individual measures.*
- European Commission. (2025, October 23). *EU adopts 19th package of sanctions against Russia.*
- European Commission. (2026, January 27). *Real SMEs, real sanctions compliance stories.*
- European Commission. (2026, February 2). *REPowerEU — phase out of Russian energy imports.*
- Eurostat. (n.d.). *EU international trade in goods — latest developments.*
- European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions.*
- Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice.*

Table 8.1.3-1 clarifies the principal analytical point of this subsection: the sanctions regime works through a sequenced interaction of effects, not through a single universal mechanism. In the short term, the regime signals, shocks, and complicates. In the medium term, it closes loopholes, hardens transmission, and turns adaptation into a contested and increasingly costly field. In the long term, it degrades capabilities, restructures dependence, and institutionalises a durable European governance posture towards Russia. Different instruments carry different weights at each stage, but their strategic significance lies precisely in their interaction. The total effect is therefore cumulative both across

¹ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions.* Policy Department for External Relations.

² European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia.*

³ European Commission. (n.d.). *Guidance documents.*

instruments and across time. That is why any serious assessment of EU sanctions against Russia must treat time horizon as part of the mechanism itself, not as a secondary contextual variable.

The resulting judgement is clear. The EU sanctions regime has been strategically more consequential as a cumulative pressure architecture than as a collection of isolated coercive acts. Its most meaningful results have emerged where political signalling, economic denial, legal structuring, hybrid disruption, and compliance transmission have reinforced one another over time. This does not mean that the regime has solved the problem of adaptation, nor that every additional measure automatically adds equal value. It does mean, however, that the overall effectiveness of the regime cannot be understood through atomised assessment. The next subsection should therefore move from cumulative mechanics to an integrated strategic judgement on what this architecture has meant in practice during 2022–2025, even in the absence of a rapid coercive breakthrough.

8.1.4. Overall Judgement on the Strategic Value of the Current Regime (2022–2025)

The overall strategic value of the current EU sanctions regime against Russia during the period 2022–2025 lies in the fact that it has already developed into a durable instrument of European governance and sustained pressure, even though it has not produced a rapid coercive breakthrough in the narrow sense of forcing an immediate reversal of Russian foreign policy. This conclusion follows directly from the comparative and cumulative analysis developed in the previous subsections. If the regime is assessed exclusively by the criterion of immediate compellence, the verdict will necessarily appear disappointing. However, if it is assessed according to the wider functions, it has demonstrably performed—degrading capabilities, narrowing strategic options, hardening coalition discipline, reinforcing legal and compliance infrastructures, and preventing the normalisation of wartime relations—then its strategic value is considerably more substantial. The EU’s own framing supports this broader understanding: the measures are explicitly designed to maximise pressure on Russia and diminish its ability to wage war, not merely to produce a single instant behavioural concession. A serious integrated judgement must therefore distinguish between limited short-term coercion and significant medium-term and long-term strategic utility. On that broader test, the regime should be judged as strategically valuable, durable, and already institutionally entrenched.

A first reason for this judgement is the scale and continuity of the regime itself. By October 2025, the EU had adopted nineteen packages of sanctions against Russia, and the Consilium sanctions pages describe these measures as part of a continuing effort to maximise pressure on Russia and use all available tools to diminish its ability to wage its war of aggression. This is not the profile of an improvised or short-lived response. It is the profile of a policy instrument that has been repeatedly renewed, expanded, adapted, and hardened over time. The sequence of packages also shows that the regime did not plateau after its initial shock phase. On the contrary, it continued to evolve in 2025 through measures targeting vital sectors of the Russian economy, shadow-fleet structures, banking channels, energy revenues, and the military-industrial base. A sanctions regime that retains political support, legal update capacity, and operational extensibility over such a period should be regarded not as a temporary symbolic gesture, but as a durable governing instrument within the EU’s external policy toolkit.

A second reason is that the regime has moved well beyond declaratory politics and has become embedded in institutional practice. The Commission’s sanctions resources pages show that the EU now maintains a consolidated sanctions helpdesk, a sanctions map, a financial sanctions list, whistleblower tools, continuously updated FAQs, and a growing body of Russia-specific guidance documents. DG FISMA also states that it monitors implementation and enforcement across Member States and supports national authorities and operators in the interpretation and application of sanctions rules. These are not incidental support functions. They are the administrative infrastructure through which restrictive measures become repeatable, governable, and economically consequential. A regime that acquires such administrative depth is no longer dependent on one-off political mobilisation alone. It

becomes capable of reproducing itself through law, guidance, monitoring, and compliance routines. In strategic terms, that is one of the clearest signs that the sanctions architecture has become durable.

This institutional maturation matters because the strategic value of sanctions is not reducible to whether they immediately change the target's headline policy. Sanctions can also be strategically valuable if they alter the structure within which the target state operates, degrade its access to markets and technologies, and increase the administrative and commercial costs of maintaining wartime activity. The Commission's Russia sanctions pages state that the post-February 2022 expansion was intended to weaken Russia's economic base, deprive it of critical technologies and markets, and significantly curtail its ability to wage war. That is already a wider and more realistic objective set than simple compellence. It aligns closely with the analysis developed in this report, especially in Parts Three, Six, and Seven, where the strongest findings concerned degradational pressure, anti-circumvention closure, and compliance transmission. Judged against those functions, the regime has already delivered substantial strategic value even in the absence of a quick diplomatic reversal by Moscow.

The economic evidence reinforces this judgement. Official Commission trade data show that EU-Russia trade in goods had fallen to EUR 67.5 billion in 2024, with EU imports from Russia at EUR 36.0 billion and EU exports to Russia at EUR 31.5 billion. This contraction reflects not one isolated measure, but the cumulative compression of a relationship that before the war had been far larger, more diversified, and more structurally significant. Such compression does not by itself prove imminent political change in Russia. But it does demonstrate that the EU has succeeded in transforming its sanctions regime into a material instrument affecting trade flows, market access, technological interfaces, and the broader external operating conditions of the Russian economy. A regime that produces this degree of restructuring should not be described as merely expressive. It has already generated strategic effects in the terrain most relevant to sustained pressure: capabilities, revenues, and long-term reproduction conditions.

The energy track gives the same conclusion even more clearly. The Commission's REPowerEU material states that the EU reduced its dependence on Russian gas from 45% at the start of the war to 12% in 2025, while oil imports from Russia fell from 27% at the beginning of 2022 to 2%. The same material states that the Commission intends to table a legislative proposal in early 2026 to ban oil imports from Russia as soon as possible and no later than 2027. These figures and policy commitments indicate more than temporary crisis management. They point to a structural strategic reorientation in which one of the most sensitive axes of EU-Russia interdependence has been progressively dismantled and subjected to a longer-term phase-out logic. From the standpoint of strategic value, this is highly significant. It means that the sanctions regime has already helped convert emergency response into durable geoeconomic reconfiguration. Even where Russia continues to export energy elsewhere, the prior energy relationship with the EU has been fundamentally weakened and placed on a trajectory of further contraction.

The 2025 packages also demonstrate that the regime has retained its offensive strategic logic rather than merely defending its earlier achievements. The 17th package targeted Russia's access to key military technology and heavily targeted the shadow fleet and energy revenues. The 18th package struck at Russia's energy, banking, and military sectors, lowered the oil price cap to USD 47.6 per barrel, extended vessel-related restrictions, and imposed a transaction ban on Nord Stream 1 and 2. The 19th package, according to the Commission, substantially increased pressure on the Russian war economy by targeting energy, finance, the military-industrial base, special economic zones, and war profiteers; the broader Consilium Ukraine overview also notes that it included a ban on imports of Russian LNG, a port access ban on more shadow-fleet vessels, and a ban on transactions with additional banks. These developments show that by late 2025 the regime was still capable of strategic deepening. Its value therefore lies not only in what it had already done, but in its demonstrated capacity to keep raising pressure in new and more targeted forms.

At the same time, the integrated judgement must remain disciplined. The Brookings analysis by Itskhoki and Ribakova argues that the sanctions imposed after February 2022, although unprecedented in scale

and scope, had so far failed to significantly alter Russia's behaviour. That conclusion is important and should not be evaded, because it directly limits any claim of full strategic success. Yet the same analytical discussion also helps clarify why this does not amount to strategic nullity. A large adaptive authoritarian state with substantial coercive capacity, resource rents, and external intermediary channels is not an easy target for rapid policy compellence. In such a case, the strategic value of sanctions lies less in instant reversal than in sustained degradation, narrowing of external options, and the progressive worsening of the terms under which continuation remains possible. The absence of rapid coercive breakthrough is therefore a real limitation, but not an adequate summary of the regime's overall utility.

This distinction is crucial because the phrase "strategic value" is broader than "coercive success". A policy instrument can be strategically valuable even if it does not by itself secure the sender's maximal political objective. In the Russian case, the sanctions regime has helped preserve EU unity, encode a durable non-normalisation position, reduce key dependencies, complicate Russian adaptation, and institutionalise a governance structure capable of sustaining pressure over time. The European Parliament's 2024 briefing on EU sanctions describes them as a key foreign and security policy instrument whose declared purpose is to uphold the international security order while encouraging targeted countries to change their behaviour. That formulation captures the dual nature of strategic value especially well. Sanctions are not only a behavioural lever. They are also a governance instrument through which the EU structures its external response to aggression. In the present case, that structuring function has already been firmly established.

Another reason to regard the regime as strategically valuable is its contribution to path dependency in EU policy. Once sanctions move from episodic reaction to institutionalised practice, they create legal, administrative, political, and commercial expectations that are not easily reversed. Operators build screening systems, banks internalise control routines, authorities develop interpretative practice, and coalition politics becomes organised around maintaining, updating, and enforcing the regime. The helpdesk, consolidated FAQs, monitoring role of DG FISMA, and increasingly dense Russia-specific guidance all indicate that this process is well under way. This path dependency matters because durable sanctions are not maintained by rhetoric alone. They are maintained by the formation of bureaucratic habits, legal routines, and market expectations that make simple rollback more difficult. In that sense, the EU sanctions regime has already become a durable component of European external governance rather than an exceptional policy episode.

The same point can be expressed from the Russian side. Strategic value exists when the target can no longer interact with Europe on the terms that prevailed before the war. The Consilium materials state that the EU measures are designed to weaken Russia's economic base, deprive it of critical technologies and markets, and significantly curtail its ability to wage war. The significance of this wording is that it describes sanctions not as a protest, but as a structured intervention into Russia's external operating environment. If, by late 2025, Russia faced a smaller and more restricted European trade relationship, tighter financial and transport constraints, more elaborate anti-circumvention scrutiny, and a progressively thicker sanctions-governance framework, then the regime had already changed the strategic terrain even without changing the Kremlin's core policy choices outright. That is precisely the kind of durable pressure architecture that warrants a positive—though qualified—strategic judgement.

A further element of strategic value lies in the regime's capacity to interact with wider coalition tools. The oil price cap, maritime restrictions, export-control coordination, and alignment with broader partner efforts mean that EU measures are not operating in a vacuum. Their weight often exceeds what would be visible from EU law alone because they are embedded in a wider network of banking, shipping, insurance, and export-control practices. This external alignment is especially relevant in assessing long-duration pressure. A sanctions regime that is coalition-compatible and administratively exportable is strategically more valuable than one that remains isolated within a single legal order. The Russia case has repeatedly shown that EU strategic value is magnified when restrictive measures form part of a broader aligned architecture rather than a strictly autonomous one. That coalition dimension further

supports the conclusion that the regime should be seen as a durable instrument of governance and sustained pressure rather than a narrowly national or purely symbolic project.

However, an integrated judgement must also specify the limits of this value. The regime has not eliminated Russian adaptation, nor has it fully closed intermediary channels, nor has it secured the kind of rapid behavioural reversal that would satisfy the strictest coercive standard. The continuing need for updated FAQs, enhanced due diligence, vessel targeting, and fresh anti-circumvention measures shows that the contest remains dynamic. Strategic value therefore does not mean strategic finality. It means that the regime has already proven itself worth maintaining and refining because it has generated durable pressure and governance capacity under conditions where rapid coercion was structurally unlikely. The correct judgement is thus neither triumphalist nor dismissive. It is that the current regime has high strategic utility, but as an instrument of attritional constraint, cumulative degradation, and policy endurance rather than as a self-sufficient mechanism of immediate coercion.

Table 8.1.4-1. Integrated judgement on the strategic value of the EU sanctions regime against Russia (2022–2025)

Criterion of judgement	What the record shows	Strategic implication	Overall assessment
Immediate coercive breakthrough	No rapid reversal of Russian foreign policy or war policy	Limits any claim of full coercive success	Limited
Durability of policy	19 sanctions packages by October 2025 and continuing renewals/updates	The regime has become a stable EU policy instrument rather than a temporary response	Strong
Institutionalisation	Helpdesk, sanctions map, consolidated list, FAQs, guidance, monitoring and enforcement support by DG FISMA	Sanctions are embedded in administrative and legal practice	Strong
Material pressure	Major contraction of EU-Russia trade and sustained tightening in energy, finance, technology, and maritime areas	The regime generates real degradational and restrictive effects	Strong
Strategic extensibility	17th–19th packages deepened pressure on shadow fleet, energy, banking, military-industrial base, LNG, and special economic zones	The regime remains scalable and adaptive	Strong
Overall strategic value	Limited narrow coercion, but strong sustained pressure and governance value	Best understood as a durable instrument of European governance and cumulative constraint	High, but qualified

Authorship: prepared by the author on the basis of official EU institutional materials and other works

Sources:

- Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.
- Council of the European Union. (n.d.). *Russia’s war against Ukraine*.
- European Commission. (n.d.). *Overview of sanctions and related resources*.
- European Commission. (2025, June 11). *Sanctions implementation*.
- European Commission. (2025, October 23). *EU adopts 19th package of sanctions against Russia*.
- Council of the European Union. (2025, May 20). *Russia’s war of aggression against Ukraine: EU agrees 17th package of sanctions*.
- Council of the European Union. (2025, July 18). *Russia’s war of aggression against Ukraine: EU adopts 18th package of economic and individual measures*.
- European Commission. (2026, February 2). *REPowerEU — phase out of Russian energy imports*.
- Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*.
- Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*.

The integrated conclusion of this subsection is therefore clear. During 2022–2025, the EU sanctions regime against Russia already acquired high strategic value as a durable instrument of European governance and sustained pressure, even though it did not achieve a rapid coercive breakthrough in the narrow sense. Its value has lain in degrading capabilities, restructuring dependencies, preserving coalition discipline, hardening implementation, and establishing a durable non-normalisation framework for EU-Russia relations. This judgement also sets up the logic of the next major section. Once the current regime is recognised as strategically valuable but not all-powerful, the analysis must turn to the structural limits of sanctions-based coercion itself—above all the limits involved in trying to coerce a large adaptive authoritarian state with significant redistributive and repressive capacity.

8.2. Structural limitations of sanctions-based coercion

8.2.1. Limits of Direct Coercion against a Large Adaptive Authoritarian State

The first structural limit of sanctions-based coercion is that direct coercion is the most demanding and therefore the least easily achieved type of sanctions success. To compel a target state means more than imposing costs on it; it means forcing a politically meaningful change in behaviour within a relatively limited time horizon. In the Russian case, this would imply that sanctions alone should have been capable of inducing a substantial revision of core foreign-policy and war-related decisions. That is an exceptionally demanding benchmark. The European Commission itself defines EU sanctions not as punitive instruments, but as measures intended to bring about a change in harmful policies or activities, while its Russia-specific sanctions overview states that the post-February 2022 packages aimed at weakening Russia’s economic base, depriving it of critical technologies and markets, and significantly curtailing its ability to wage war. This formulation already suggests a broader and more realistic logic than instant compellence. The problem arises when public or political discourse collapses this broader strategic design into the narrow question of whether sanctions have already “forced” Russia to reverse course. Against a large adaptive authoritarian state, that expectation is analytically inflated from the outset^{1,2,3}.

The second limit is Russia’s sheer scale as a target. Large states with extensive territory, sizeable domestic markets, strategic natural resources, and a broad coercive apparatus are intrinsically harder to coerce from the outside than smaller, more externally dependent, and more institutionally fragile targets. This is especially true when the target remains integrated into global commodity markets and can continue to monetise at least part of its export base even under sanctions. The Brookings analysis by Itskhoki and Ribakova argues that the impact of the post-2022 sanctions has been mixed, and explicitly notes that sanctions are not a guaranteed solution to end wars or alter a country’s behaviour. The same paper also emphasises that, in 2022, sanctions design still allowed energy exports to continue because of Russia’s integration into global commodity markets. This is central to the present subsection. A state that retains the ability to export key commodities, redirect trade, and generate revenue under altered but still functional external conditions does not face the kind of immediate systemic suffocation that would make rapid coercion likely. Instead, it faces a long-duration contest over costs, constraints, and future options^{4,5}.

¹ European Commission. (n.d.). *Overview of sanctions and related resources*.

² European Commission. (n.d.). *Sanctions adopted following Russia’s military aggression against Ukraine*.

³ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

⁴ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

⁵ Smeets, M. (2018). *Can economic sanctions be effective?* World Trade Organization Working Paper ERSD-2018-03.

A third limit follows from regime type. Authoritarian systems are less dependent on open societal consent than democratic ones and therefore possess a wider repertoire for insulating decision-makers from external pressure. Christian von Soest’s analysis of authoritarian responses to sanctions pressure is directly relevant here. He argues that authoritarian governments represent particularly problematic targets because they can shield themselves from external pressure more easily than democratic counterparts can, precisely because of their lower degree of political competition, participation, rule of law, and their considerable control over public discourse. The same paper stresses that authoritarian regimes are harder to influence from the outside and are better able to isolate ruling elites from social costs. This means that even where sanctions generate genuine economic pain, the transmission from social suffering to political concession is uncertain and often weak. A regime with broad repressive powers does not have to respond to sanctions the way an electorally exposed government would. It can contain, redirect, or selectively absorb pressure rather than negotiating under it^{1,2}.

A fourth limit is the regime’s capacity for internal redistribution. Sanctions do not strike all actors equally, and authoritarian systems often retain greater freedom than democracies to decide who will bear the costs. Von Soest’s table of internal means of “pressure proofing” explicitly identifies redistribution to political constituencies, elites, supportive regions, and other regime-linked actors as a central authoritarian strategy. This matters because direct coercion depends on pain reaching the decision-making core in a politically meaningful way. If the regime can move resources towards strategic sectors, security institutions, loyal business circles, or politically important social groups while shifting losses onto diffuse or politically marginal populations, then sanctions may still hurt the country without compelling the leadership. In that sense, redistribution acts as a coercion buffer. Russia’s size, state capacity, and war-oriented fiscal prioritisation have increased the plausibility of exactly this mechanism. As a result, sanctions pressure does not automatically convert into elite fracture or policy reversal. It may instead be managed through selective compensation and asymmetric burden shifting^{3,4}.

A fifth limit lies in the relationship between sanctions and repression. Sanctions are often expected to weaken authoritarian control by increasing social grievances, but the empirical literature is much more cautious. Von Soest notes that there is solid empirical evidence that sanctions, albeit unintentionally, contribute to increased human rights violations and state repression in targeted regimes. His paper further explains that authoritarian regimes tend to maintain power through a mixture of repression, co-optation, and legitimation, and that they regularly step up repression to intimidate would-be protesters when faced with external pressure. This is highly relevant to Russia. A regime that reacts to external pressure by intensifying censorship, propaganda, policing, and coercion does not become more easily coerced in the short term; it may become harder to dislodge politically even while becoming more brittle structurally. Sanctions can therefore increase stress without producing direct concession. In other words, the existence of hardship is not enough; the political transmission channel matters, and under authoritarian conditions that channel is often blocked or violently suppressed^{5,6}.

A sixth limit is discursive and political rather than purely economic. Sanctions do not only alter material conditions; they also enter the regime’s legitimation strategy. Grauvogel and von Soest argue that sanctions can strengthen authoritarian rule if the regime manages to incorporate their existence into its narrative of legitimacy. Von Soest’s later work similarly refers to rally-round-the-flag effects, nationalist discourse, and the framing of sanctions as imperialist attacks on the whole country rather than as

¹ Ibid.

² von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

³ Ibid.

⁴ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions*. Policy Department for External Relations.

⁵ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

⁶ Grauvogel, J., & von Soest, C. (2014). *Claims to legitimacy count: Why sanctions fail to instigate democratisation in authoritarian regimes*. *European Journal of Political Research*, 53(4), 635–653.

targeted restrictions aimed at state behaviour. This mechanism is not universal, but it is crucial in the Russian case. A highly centralised information environment can reinterpret sanctions as proof of external hostility, thereby reinforcing the regime's claim that it is defending national sovereignty against a hostile West. Under such conditions, sanctions may still damage capabilities while at the same time reducing the immediate political probability of concession. That paradox is one of the key reasons why direct coercion is limited: the target may convert external pressure into internal narrative capital^{1,2}.

A seventh limit is external adaptation. Even severe sanctions do not operate against the target in a closed system. The European Parliament's 2025 state-of-play note on EU sanctions against Russia stresses that the unprecedented scale and scope of the measures created new implementation challenges and required renewed efforts to close loopholes and prevent circumvention, including through reinforced cooperation with third countries and measures against Russia's shadow fleet. This is a crucial admission. A large target state can partially offset pressure through re-routing, alternative suppliers, shadow logistics, new financial channels, proxy structures, and third-country facilitators. The existence of such channels does not nullify sanctions, but it reduces the chance of rapid coercive success. Instead of a simple sender-target interaction, the regime becomes a multi-actor struggle over enforcement, evasion, and adaptation. Under these conditions, sanctions are more likely to degrade over time than to compel quickly. Direct coercion becomes especially difficult when the target can still preserve a minimum external operating space^{3,4}.

An eighth limit lies on the sender side, inside the EU and the wider coalition. Sanctions are often discussed as if they were imposed by a unitary actor with perfect control over implementation, but the European Parliament's 2023 study on implementation and monitoring shows that EU sanctions enforcement has traditionally relied on a decentralised system, resulting in a mosaic of practices across the Union involving more than 160 designated competent authorities. The same study warns that this poses risks of practical confusion and contradictory legal interpretations across Member States. This matters for direct coercion because compellence requires exceptionally high-quality and rapid transmission. If implementation is uneven, guidance still evolving, and enforcement capacity distributed asymmetrically, the pressure that reaches the target will often be slower, leakier, and more fragmented than the legal texts imply. Direct coercion is therefore constrained not only by Russian resilience but also by the institutional manageability of the sanctions' regime itself. A regime can still be strategically valuable under such conditions, but it becomes less likely to produce fast, sharp, and unambiguous coercive outcomes^{5,6}.

A ninth limit concerns time. Direct coercion presumes that costs will accumulate faster than the target's ability to absorb, redistribute, narrate, and circumvent them. Yet the evidence from Russia points in the opposite direction. The Brookings paper stresses both that sanctions imposed substantial costs and that their impact remained mixed; the 2023 EPRS briefing similarly noted that, although sanctions had sent a strong signal, degraded Russian military capabilities, and were asphyxiating parts of the economy and energy sector, many experts warned that the impact would not be severe enough to limit Russia's ability to wage war in the near term. These are not contradictory findings. They indicate that sanctions may be effective in degradational and coordinative terms while still underperforming in immediate coercive terms. This temporal distinction is essential. Large authoritarian states do not need to "win" economically to resist coercion; they only need to remain politically and organisationally intact for long

¹ Ibid.

² von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

³ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

⁴ European Commission. (n.d.). *Guidance documents*.

⁵ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*. Policy Department for External Relations.

⁶ European Commission. (2025, June 11). *Sanctions implementation*.

enough to avoid concession. Russia’s resilience has therefore not disproved sanctions pressure, but it has sharply exposed the limits of direct sanctions-based compellence^{1,2}.

The analytical conclusion is therefore precise. Sanctions can impose heavy costs on Russia, weaken its economic base, narrow its technological options, and progressively reduce the quality of its external operating environment, but these effects do not translate mechanically into rapid political reversal. The core reason is structural. Russia is a large, resource-rich, globally connected, authoritarian state with substantial repressive capacity, significant room for internal redistribution, and a continuing ability to exploit external intermediary channels. The EU’s sanctions policy recognises this indirectly by continuously expanding not only the lists of restrictions but also the implementation, anti-circumvention, and guidance architecture around them. That is the behaviour of a coalition confronting a hard target, not a fragile one. The sanctions regime therefore remains strategically meaningful, but its most realistic contribution lies in attritional constraint and cumulative degradation rather than in short-term direct coercion. This is the central limit that must frame the rest of Part Eight^{3,4,5}.

Table 8.2.1-1. Why direct coercion is structurally limited against a large adaptive authoritarian state

Limiting factor	Mechanism	Why it weakens direct coercion in the Russian case	Relative significance
Large state scale	Size, territorial depth, domestic market, coercive apparatus	Makes rapid external strangulation improbable	High
Resource and commodity base	Continued revenue generation through strategic exports	Preserves state income and policy room for manoeuvre	High
Authoritarian insulation	Lower dependence on electoral consent and stronger control over discourse	Weakens transmission from social pain to policy concession	High
Internal redistribution	Reallocation of costs and benefits across elites, sectors, and regions	Protects politically relevant groups from maximum pressure	High
Repression capacity	Censorship, policing, intimidation, coercive containment	Blocks protest-to-concession pathways	High
Legitimising narrative	Reframing sanctions as foreign hostility	Converts external pressure into nationalist mobilisation	Medium-High
External adaptation channels	Re-routing, third-country facilitation, shadow logistics	Reduces immediate economic closure	High
Sender-side fragmentation	Uneven enforcement, administrative complexity, interpretative variation	Dilutes speed and sharpness of sanctions transmission	Medium-High

Authorship: prepared by the author on the basis of official EU institutional materials

Sources:

- European Commission. (n.d.). *Sanctions adopted following Russia’s military aggression against Ukraine*.
- European Commission. (n.d.). *Overview of sanctions and related resources*.
- European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions*.
- European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.
- Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*.
- von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*.

¹ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

² European Parliament. (2023, March). *EU sanctions on Russia: Overview, impact, challenges*.

³ European Commission. (n.d.). *Sanctions adopted following Russia’s military aggression against Ukraine*.

⁴ European Commission. (n.d.). *Overview of sanctions and related resources*.

⁵ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

- Grauvogel, J., & von Soest, C. (2014). *Claims to legitimacy count: Why sanctions fail to instigate democratisation in authoritarian regimes.*

8.2.2. Adaptation, Re-Routing, and External Intermediary Channels

The second structural limitation of sanctions-based coercion lies in the target state's capacity to adapt externally through re-routing, intermediary jurisdictions, service fragmentation, and proxy commercial structures. In the Russian case, this has been one of the central reasons why sanctions have generated strong degradational pressure without producing a rapid coercive breakthrough. Once the original EU-Russia commercial interface was narrowed, the strategic contest did not end; it changed form. Trade, finance, logistics, insurance, registration, and technology procurement began to migrate into more complex and less transparent channels. This means that sanctions no longer operated primarily as a direct block on bilateral exchange, but increasingly as a contest over whether substitute channels could be identified, scaled, and protected. The result was a shift from a model of immediate closure to one of continuous restriction, monitoring, and anti-circumvention pressure. In such a setting, sanctions may still be effective, but they function less as a single decisive blow and more as a long-duration struggle over the cost and viability of adaptation^{1,2,3}.

This point is visible in the EU's sanctions narrative. The European Parliament's 2025 state-of-play briefing notes that the unprecedented scale and scope of EU sanctions created new implementation challenges, and that Member States and EU institutions renewed efforts to improve enforcement and close loopholes to prevent circumvention. The same briefing explicitly identifies the shadow fleet as an instrument used by the Russian government to circumvent sanctions and continue selling oil above the price cap worldwide. This is analytically decisive. It means that, by 2024–2025, the problem was no longer simply whether the EU had adopted sufficiently broad sanctions on paper. The problem had become whether those sanctions could remain effective once Russia and its partners reorganised trade and logistics around alternative routes, opaque ownership patterns, and third-country nodes. In other words, circumvention did not appear at the margins of the regime; it moved to its centre. That is why adaptation and re-routing must be treated as structural constraints on direct coercion rather than as secondary implementation details^{4,5}.

A first mechanism of adaptation is trade re-routing through third countries. The European Parliament's 2025 briefing states that the EU has stepped up sanctions' diplomacy and that the EU Sanctions Envoy has led intensive outreach towards jurisdictions at risk of facilitating sanctions evasion, including Türkiye, Central Asia, the South Caucasus, China, Vietnam, and the United Arab Emirates. This is a very important institutional signal. It shows that EU policymakers no longer assume that sanctions effectiveness can be secured solely inside the Union's customs and financial perimeter. Instead, the regime increasingly depends on what happens beyond that perimeter, in the intermediary spaces through which goods, components, finance, and services may be redirected. A sanctions architecture that must actively manage the behaviour of third-country transit, trading, and financial jurisdictions is already operating in a more difficult environment than a simple bilateral embargo model presumes. The externalisation of trade flows into third-country channels therefore weakens the directness of coercion, even if it does not eliminate cumulative pressure^{6,7}.

A second mechanism is the reorganisation of exports and shipping through the shadow fleet and related maritime service ecosystems. The Council's 17th package press release states that the Union targeted

¹ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges.*

² European Commission. (n.d.). *Sanctions adopted following Russia's military aggression against Ukraine.*

³ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia.* *European Journal on Criminal Policy and Research*, 30(2), 211–228.

⁴ Council of the European Union. (n.d.). *EU sanctions against Russia: questions and answers.*

⁵ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges.*

⁶ Ibid.

⁷ European Commission. (2024, September 24). *Sanctions vis-à-vis Russia: Commission publishes G7 Industry Guidance on preventing sanctions evasion.*

189 additional vessels from third countries, bringing the total number of designated vessels at that point to 342, and explicitly said that these restrictions were intended to dismantle the operational capacity of the shadow fleet and thereby reduce the oil revenues supporting Russia's war economy. The Council's 19th package press release then added 117 more vessels, bringing the total to 557, and also introduced a ban on reinsuring vessels belonging to the shadow fleet. These measures matter because they show that Russia's adaptation in oil exports was not merely a commercial redirection; it required an entire support structure involving tankers, flags, insurers, registries, operators, and facilitators. The strategic implication is clear: where a sanctioned state can build or access an alternative maritime infrastructure, the sanctions regime must escalate from commodity restrictions to network disruption. Direct coercion becomes weaker because the target is no longer dependent on the original shipping and service channels alone^{1,2}.

A third mechanism is facilitation by actors located outside Russia itself. The 17th package text is especially revealing here because it did not limit itself to vessels. It also imposed asset freezes and bans on making funds available to actors enabling the operation of the shadow fleet, including entities from the United Arab Emirates, Türkiye and Hong Kong, as well as an important insurer of the Russian oil shipping industry. The 19th package went further by targeting Litasco Middle East DMCC in the UAE, as well as maritime registries providing false flags to shadow-fleet vessels. These are not marginal details. They demonstrate that sanctions circumvention increasingly depends on a transnational ecosystem of intermediaries rather than on direct Russia-EU transactions alone. Once this happens, the sanctions regime ceases to be purely sender-target in structure. It becomes triangular, networked, and jurisdictionally fragmented. That structural change matters because every additional layer of intermediaries lowers the immediacy of pressure on the target and increases the administrative burden on the sender coalition^{3,4}.

A fourth mechanism concerns technology and battlefield-relevant components, where re-routing often takes the form of re-export rather than direct shipment. The European Parliament's 2025 briefing notes that the EU's Common High Priority items list currently includes 50 items and supports due diligence and targeted anti-circumvention actions by third-country authorities under G7 guidelines. The Commission's July 2025 FAQ on enhanced due diligence for operators manufacturing or trading in CHP items states explicitly that the purpose of the measure is to respond to the re-exportation of such items and to give national competent authorities a tool to curb circumvention through third countries. This is a major admission by the EU system itself. It recognises that the challenge is not only the original export from the Union, but the downstream diversion and re-export chain. In practical terms, this means that the effectiveness of export controls depends not simply on what leaves the EU customs territory, but on what happens to goods after they enter intermediary jurisdictions. That greatly reduces the plausibility of rapid direct coercion and pushes the regime towards continuous due diligence, contractual controls, and risk-based monitoring^{5,6,7}.

A fifth mechanism is service fragmentation. Even where a single operator withdraws, the sanctioned trade may continue through a chain of smaller intermediaries, brokers, online sellers, logistics providers, and repackaging entities. Recent economic research on intermediary online firms is relevant here because it shows that, after the invasion, sales to Russia by global brands dropped substantially but not absolutely, and that intermediaries helped sustain a residual commercial presence where legal and

¹ Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.

² Council of the European Union. (2025, May 20). *Russia's war of aggression against Ukraine: EU agrees 17th package of sanctions*.

³ Ibid.

⁴ Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.

⁵ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

⁶ European Commission. (2025, July 23). *Enhanced due diligence for operators manufacturing and/or trading with CHP items: Frequently asked questions*.

⁷ European Commission. (2024, February 22). *List of common high priority items*.

reputational constraints deterred direct exposure. This matters because it captures a more general sanctions dynamic. Restrictive measures may substantially reduce direct trade, yet not eliminate commercial access if intermediary layers emerge that are willing to absorb legal, financial, or reputational risk. Such fragmentation makes enforcement more difficult because it multiplies the number of actors involved and blurs the distinction between direct exporter, marketplace, reseller, and logistics facilitator. In strategic terms, it means that adaptation may proceed not only through states and large firms, but also through decentralised commercial micro-channels^{1,2}.

The oil sector provides perhaps the clearest empirical example of how adaptation does not remove pressure but changes its form. A recent *Energy Economics* study concludes that the volume of Russian crude exports remained broadly stable after the invasion and sanctions, but that revenues declined markedly, exports shifted towards Asia, shipping distances increased, and substantial price discounts emerged. This is an analytically important result. It shows that sanctions did not simply “fail” because Russia continued exporting oil. Rather, they forced Russia to do so on less favourable terms, through longer and more complex routes, at lower realised prices, and with heavier reliance on vulnerable maritime infrastructure. The same logic undercuts simplistic arguments on both sides: it was not full strangulation, but neither it was business as usual. What emerged instead was a classic long-duration sanctions contest in which volumetric resilience coexisted with lower efficiency, greater opacity, and reduced revenue yield^{3,4}.

This is why adaptation, re-routing, and intermediary facilitation transform the sanctions regime into a long-duration contest rather than a single coercive event. The sender coalition must repeatedly identify new circumvention pathways, update legal categories, expand due-diligence expectations, pressure third countries, and target enablers in shipping, insurance, registry, banking, and crypto. The Commission’s circumvention and due-diligence FAQs, the 2023 operator guidance, the 2024 G7 industry guidance, and the specific 2025 CHP due-diligence FAQ all show that the EU has progressively moved in exactly this direction. This is the behaviour of a sanctions regime that recognises adaptation as structurally normal rather than exceptional. The implication is that sanctions effectiveness increasingly depends not on the one-off breadth of restrictions, but on the speed and quality with which loopholes are identified and closed. The coercive horizon therefore lengthens. Pressure remains real, but it becomes more attritional, more technical, and more dependent on institutional stamina^{5,6,7,8}.

The analytical conclusion is therefore straightforward. Adaptation, re-routing, and external intermediary channels do not prove that sanctions against Russia are ineffective. What they prove is that sanctions against a large adaptive authoritarian state cannot remain effective unless they evolve from static prohibitions into dynamic anti-circumvention systems. These channels reduce the probability of quick direct coercion because they preserve a partial external operating space for the target. At the same time, they often increase transaction costs, reduce revenue quality, lengthen supply chains, and create new vulnerabilities that can themselves be targeted. The result is not a nullification of sanctions, but a transformation of their logic. Under these conditions, sanctions operate less as immediate compellence and more as cumulative attritional pressure. That is why the EU’s later sanctions packages, guidance architecture, and third-country outreach should be interpreted as evidence not of sanctions failure, but

¹ Avdeenko, A., Kaiser, M., Kis-Katos, K., & Reher, L. (2026). *Sanctions, sales, and stigma: Intermediary online firms’ market role in sustaining trade*. *Journal of International Economics*, 159, 104197.

² European Commission. (2024, February 19). *Guidance on due diligence*.

³ Babina, T., Hilgenstock, B., Itskhoki, O., Mironov, M., Ribakova, E., & Shapoval, N. (2026). *Russian oil exports under international sanctions*. *Energy Economics*, 153, 109006.

⁴ Council of the European Union. (2025, May 20). *Russia’s war of aggression against Ukraine: EU agrees 17th package of sanctions*.

⁵ European Commission. (2023, September 7). *Sanctions: Commission publishes guidance to help European operators assess sanctions circumvention risks*.

⁶ European Commission. (2024, September 24). *Sanctions vis-à-vis Russia: Commission publishes G7 Industry Guidance on preventing sanctions evasion*.

⁷ European Commission. (2024, December 11). *Circumvention and due diligence*.

⁸ European Commission. (2025, July 23). *Enhanced due diligence for operators manufacturing and/or trading with CHP items: Frequently asked questions*.

of the structural form that sanctions enforcement must take against a target of Russia’s size and adaptability^{1,2,3}.

Table 8.2.2-1. Main adaptation channels reducing the direct coercive effect of sanctions against Russia

Adaptation channel	How it works	Why it weakens direct coercion	What kind of EU response has emerged
Third-country trade re-routing	Goods and components move through intermediary jurisdictions before reaching Russia	Preserves access to inputs and blunts immediate closure	Sanctions diplomacy, G7 guidance, intensified due diligence, outreach to high-risk jurisdictions
Re-export of CHP and sensitive goods	Battlefield-relevant items are diverted or re-exported from third countries	Weakens the direct impact of export controls	Common High Priority list, Article 12gb due-diligence obligations, operator FAQs
Shadow-fleet shipping	Non-EU vessels, deceptive shipping practices, false flags, and service evasion sustain oil exports	Preserves energy-export channels and revenue flows	Vessel designations, port access bans, service bans, reinsurance bans
Third-country facilitators	Shipping firms, registries, insurers, traders, banks, crypto actors enable sanctions evasion	Creates transnational support structures outside the original sender-target dyad	Listings of enablers, banking restrictions, crypto-related designations, pressure on registries
Commercial fragmentation	Intermediaries, brokers, online sellers, and logistics chains sustain residual trade	Multiplies enforcement points and obscures responsibility	Enhanced compliance expectations, red-flag screening, risk-based due diligence

Authorship: prepared by the author on the basis of official EU institutional materials and other works

Sources:

- European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.
- European Commission. (2024, December 11). *Circumvention and due diligence*.
- European Commission. (2025, July 23). *Enhanced due diligence for operators manufacturing and/or trading with CHP items: Frequently asked questions*.
- Council of the European Union. (2025, May 20). *Russia’s war of aggression against Ukraine: EU agrees 17th package of sanctions*.
- Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.
- Babina, T., Hilgenstock, B., Itshoki, O., Mironov, M., Ribakova, E., & Shapoval, N. (2026). *Russian oil exports under international sanctions*. *Energy Economics*, 153, 109006.

8.2.3. Internal Constraints within the EU and the Coalition

A third structural limit of sanctions-based coercion lies not in Russia’s adaptive capacity alone, but within the sender coalition itself. Sanctions are often discussed as though the EU and its partners form a perfectly unified and frictionless coercive actor. In reality, the sanctions regime is constrained by legal proportionality, administrative manageability, uneven enforcement capacity, private-sector compliance burdens, political sustainability, and the constant requirement to preserve coalition coordination. These internal limits do not make sanctions irrelevant. However, they do affect the speed, intensity, consistency, and extensibility of the pressure that can be generated. In the Russian case, the issue is therefore not simply whether the EU is willing to sanction, but under what legal, institutional, and

¹ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

² Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.

³ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

political conditions it can continue doing so effectively over time. This matters because direct coercion requires not only pressure on the target, but also unusually high coherence on the sender side. Where that coherence is incomplete or costly to maintain, coercive sharpness is reduced even if strategic pressure remains substantial^{1,2,3}.

The first internal constraint is legal proportionality and targeting discipline. The Council's sanctions explainer states that EU sanctions are carefully targeted, designed to be proportionate, and temporary in nature, and that they are regularly reviewed and can be calibrated, eased, or ended if EU objectives, or meaningful steps towards them, are achieved. The Council's general sanctions pages likewise stress that sanctions are not punitive and do not target a country or population, but are aimed at changing the policy or conduct of those targeted. This is fundamental to the Union's normative design, but it is also a limitation from the standpoint of direct coercion. A regime that must remain proportionate, targeted, and reviewable cannot simply maximise pain without regard to collateral effects, legal defensibility, or humanitarian consequences. The EU's legal-political model therefore excludes some of the most indiscriminate forms of economic coercion by design. That is a strength in normative terms, but it also narrows the menu of available coercive escalation and slows the move from political intention to maximal pressure^{4,5,6}.

A second internal constraint is the decision-making rule of unanimity. The Council explains that decisions on sanctions under the Common Foreign and Security Policy are taken by unanimity, and that both decisions and regulations on sanctions are adopted by the Council by unanimity. This institutional requirement gives every Member State a potential veto over new restrictive measures or over changes to existing ones. In periods of high political cohesion, unanimity can still produce strong results, as demonstrated by the successive Russia packages. Yet unanimity also makes sanction policy more vulnerable to bargaining, sequencing delays, issue-linkage, and the need for internal compromise. The very fact that the EU has maintained a 19-package regime against Russia is politically impressive, but it should not obscure the structural constraint built into the procedure itself. A coercive instrument that depends on repeated unanimous agreement is inherently more difficult to sharpen quickly than one controlled by a single executive authority. Coalition maintenance is therefore not a secondary political issue; it is built into the formal mechanics of sanctions production^{7,8,9}.

A third constraint is administrative manageability. The European Parliament's 2023 implementation study argues that sanctions implementation and enforcement in the EU have traditionally remained in the hands of national authorities and that this has produced a mosaic of practices across the Union. The same study emphasises that the unprecedented emphasis on implementation and enforcement after the 2022 invasion revealed how demanding sanctions administration becomes once a regime expands in scale and complexity. This is highly relevant to the Russian case. A sanctions system composed of listings, trade bans, service restrictions, vessel measures, ownership rules, due-diligence expectations, reporting duties, derogations, and anti-circumvention obligations is not self-executing. It places heavy burdens on customs, licensing bodies, financial supervisors, prosecutors, ministries, and private operators. The more elaborate the regime becomes, the more it depends on practical coordination, legal clarity, data access, and institutional stamina. Administrative manageability is therefore itself a

¹ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*. Policy Department for External Relations.

² European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

³ Council of the European Union. (n.d.). *How the EU adopts and reviews sanctions*.

⁴ Council of the European Union. (n.d.). *EU sanctions against Russia: questions and answers*.

⁵ Council of the European Union. (2014, April 29). *EU restrictive measures (sanctions) in force*.

⁶ Council of the European Union. (n.d.). *Why the EU adopts sanctions*.

⁷ Ibid.

⁸ Council of the European Union. (n.d.). *How the EU adopts and reviews sanctions*.

⁹ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

structural constraint on coercive intensity. A regime may be legally broad yet operationally diluted if its enforcement and interpretative infrastructure becomes overstretched^{1,2}.

A fourth internal limit is uneven enforcement and implementation asymmetry. The Commission's sanctions resources page states clearly that Member States are responsible for the implementation and enforcement of EU sanctions, as well as for identifying breaches and imposing penalties, while the Commission monitors correct and uniform implementation and provides guidance to Member States. That division of responsibilities is institutionally normal in the EU, but it creates an intrinsic asymmetry problem. If implementation and penalties depend primarily on national systems, then differences in administrative capacity, political priority, legal culture, and enforcement resources can affect the real force of sanctions across the Union. The Commission's continued reliance on FAQs, guidance, and monitoring support reflects awareness of this problem. What exists formally at EU level may still be applied unevenly in practice. This weakens direct coercion because the target and its facilitators can exploit inconsistencies, delays, or lower-risk jurisdictions inside the sender bloc^{3,4,5}.

A fifth constraint is the problem of legal transposition and criminalisation gaps. Directive (EU) 2024/1226 was adopted to harmonise the definition of criminal offences and penalties for violations of Union restrictive measures. The directive significantly strengthens the legal back end of the sanctions regime by requiring Member States to criminalise relevant forms of sanction violation and to provide for liability of legal persons. Yet the Commission announced in July 2025 that it was opening infringement procedures against a large number of Member States for failing to notify full transposition of the directive by the required deadline. This is analytically important because it reveals that even when the EU agrees on stronger criminal-law architecture, implementation can lag behind political ambition. Direct coercion is weakened when the legal consequences of sanctions breaches are not yet equally embedded across the Union. The sender coalition may then appear strong at the level of legislation, but uneven at the level of enforceable criminal deterrence^{6,7}.

A sixth internal constraint concerns the burden on private operators, especially firms that must operationalise sanctions in complex cross-border environments. The Commission's sanctions helpdesk page states that the platform supports European operators in complying with EU restrictive measures worldwide and is aimed primarily at SMEs, offering cost-free personalised help for sanctions due-diligence checks. The 2025 implementation note again highlighted the practical assistance offered to operators. These institutional developments are useful, but they also reveal a structural reality: the sanctions regime depends heavily on private firms to screen counterparties, verify ownership, assess goods, monitor routes, document transactions, and escalate risk. That places considerable compliance demands on businesses, particularly where legal ambiguity, complex ownership chains, or dual-use concerns are involved. A sanctions system that relies on private-sector transmission can be highly effective, but it also becomes sensitive to over-compliance, de-risking, fatigue, and uneven corporate capacity. The burden borne by operators is therefore not a side issue. It is one of the main constraints on how far and how fast the regime can be expanded without impairing usability and legal certainty^{8,9,10}.

¹ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*. Policy Department for External Relations.

² European Commission. (n.d.). *Overview of sanctions and related resources*.

³ Ibid.

⁴ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.

⁵ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*. Policy Department for External Relations.

⁶ European Union. (2024, April 24). *Directive (EU) 2024/1226 on the definition of criminal offences and penalties for the violation of Union restrictive measures*.

⁷ European Commission. (2025, July 23). *Commission takes action to ensure complete and timely transposition of the Directive on the criminalisation of the violation of Union restrictive measures*.

⁸ European Commission. (n.d.). *Overview of sanctions and related resources*.

⁹ European Commission. (2025, June 11). *Sanctions implementation*.

¹⁰ European Commission. (2026, January 27). *Real SMEs, real sanctions compliance stories*.

A seventh limit is political sustainability inside the EU. The European Parliament's 2023 study states that it is increasingly recognised that the use of sanctions is not cost-free for the EU and its Member States, and that effective implementation and enforcement are crucial if the measures are to remain meaningful. More broadly, EU institutions in 2024–2025 repeatedly stressed the need to reduce administrative and compliance burdens on EU companies and national authorities, and to preserve legal certainty and predictability. Although these discussions are not sanctions-specific in every instance, they are highly relevant to sanctions policy because they indicate the broader political environment in which restrictive measures must function. A sanctions regime that becomes excessively burdensome, legally opaque, or economically distortive for its senders' risks generating erosion of support, demands for simplification, or resistance to further tightening. Political sustainability therefore constrains coercive escalation even where moral and geopolitical support for Ukraine remains strong. Endurance requires not only external resolve but also domestic governability^{1,2}.

An eighth internal constraint is coalition coordination beyond the EU proper. The Russia sanctions regime has been materially strengthened by cooperation with G7 partners and by broader alignment on export controls, maritime measures, and price-cap policy. Yet this alignment itself requires continual political work. The European Parliament's 2025 briefing explicitly refers to intensified sanctions diplomacy, closer work with like-minded jurisdictions, and reinforced cooperation with third countries to prevent circumvention. This indicates that coalition coherence cannot be assumed. It must be maintained. The more sanctions depend on coordinated implementation across shipping, finance, insurance, customs, and export-control systems, the more internal and external coordination become part of the same constraint structure. A coalition-wide regime can produce stronger cumulative pressure than a single-actor regime, but it is also more exposed to differences in priorities, enforcement cultures, and risk tolerance. Direct coercion therefore remains limited not only because Russia adapts, but because the coalition must constantly reproduce its operational unity^{3,4}.

A ninth and final internal constraint is that the EU's sanctions model is embedded in a broader conception of law-governed external action. Sanctions are meant to be part of a comprehensive policy approach, not a free-standing substitute for diplomacy, security support, legal action, and other instruments. The older Council overview of EU restrictive measures already underlined that sanctions are always part of a comprehensive policy approach involving political dialogue and complementary efforts. This matters analytically because it means the EU does not conceptualise sanctions as an unlimited stand-alone weapon. They are one element of a larger strategic framework. Consequently, internal legal and political constraints are not accidents obstructing a pure coercive instrument; they are part of the very model through which the EU deploys sanctions. This makes the regime more defensible and more legitimate, but also less likely to approximate maximalist coercive blockade logic. Against Russia, this implies that sanctions should be understood as a constrained but durable instrument of pressure, not as an unconstrained coercive technology^{5,6}.

The conclusion of this subsection is therefore clear. Internal constraints within the EU and the wider coalition do not negate the strategic value of sanctions against Russia, but they do explain why sanctions rarely achieve direct coercion with the speed imagined in more rhetorical accounts. Legal proportionality limits indiscriminate escalation. Unanimity slows and conditions major decisions. Decentralised implementation produces unevenness. Criminalisation and enforcement capacity take time to converge. Private firms bear heavy compliance burdens. Political sustainability must be preserved inside the sender bloc. Coalition coordination must be continually maintained across jurisdictions.

¹ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*. Policy Department for External Relations.

² European Parliament. (2025, June 26). *Key issues in the European Council: State of play as of June 2025*.

³ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

⁴ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

⁵ Council of the European Union. (2014, April 29). *EU restrictive measures (sanctions) in force*.

⁶ Council of the European Union. (n.d.). *Why the EU adopts sanctions*.

These are not incidental problems. They are structural features of how the EU sanctions model operates. The practical result is that sanctions remain most effective as cumulative, legally structured, coalition-based pressure rather than as a rapid instrument of unilateral compellence^{1,2,3}.

Table 8.2.3-1. Internal constraints reducing the direct coercive effect of EU sanctions

Internal constraint	Mechanism	Why it limits direct coercion	Strategic consequence
Legal proportionality	Sanctions must remain targeted, proportionate, temporary, and reviewable	Narrows scope for indiscriminate escalation	Preserves legitimacy, but reduces maximal pressure
Unanimity in adoption	Council decisions and regulations require unanimous agreement	Slows tightening and increases compromise pressures	Makes escalation politically more demanding
Decentralised implementation	Member States enforce sanctions and impose penalties	Creates unevenness across jurisdictions	Reduces uniformity of pressure transmission
Administrative complexity	Large sanctions regimes require guidance, FAQs, licensing, monitoring, and coordination	Risks overload and interpretative fragmentation	Can widen the gap between legal design and practical effect
Criminalisation gaps	Transposition of Directive (EU) 2024/1226 may lag	Weakens deterrence against violations and circumvention	Slows convergence of enforcement severity
Private-sector burden	Firms must operationalise screening, due diligence, and documentation	Can generate over-compliance, fatigue, and uneven uptake	Makes pressure dependent on corporate capacity
Political sustainability	Sanctions are not cost-free for Member States and EU firms	Limits appetite for indefinite broadening without refinement	Pushes the regime towards selective rather than unlimited escalation
Coalition coordination	EU pressure depends on internal and external alignment	Creates dependence on continued common positions	Stronger cumulatively, but harder to maintain sharply

Authorship: prepared by the author on the basis of official EU institutional materials

Sources:

- European Union. (n.d.). Why the EU adopts sanctions.
- Council of the European Union. (n.d.). How the EU adopts and reviews sanctions.
- Council of the European Union. (n.d.). EU sanctions against Russia: questions and answers.
- European Commission. (n.d.). Overview of sanctions and related resources.
- European Commission. (2025, July 23). Commission takes action to ensure complete and timely transposition of the Directive on the criminalisation of the violation of Union restrictive measures.
- European Parliament. (2023, October). Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions.
- European Parliament. (2025, February 11). EU sanctions against Russia 2025: State of play, perspectives and challenges.

8.2.4. The Risk of Diminishing Returns and Sanctions Fatigue

A fourth structural limit of sanctions-based coercion is the risk of diminishing returns. This does not mean that sanctions suddenly cease to matter, nor that later measures become useless. It means that, after the first large rounds of restrictions have already hit the most visible targets, each additional layer

¹ European Parliament. (2024, April). *EU sanctions: A key foreign and security policy instrument*.

² European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions*. Policy Department for External Relations.

³ Council of the European Union. (n.d.). *How the EU adopts and reviews sanctions*.

of sanctions may produce a smaller marginal strategic yield unless it closes concrete loopholes, improves enforcement, or sharpens implementation discipline. In the Russian case, this risk arises precisely because the regime has already become broad, dense, and highly layered by 2025. Once a sanctions architecture reaches that stage, the relevant analytical question is no longer simply how to add more restrictions, but how to preserve or increase the effectiveness of the restrictions already in place. Sanctions can therefore enter a saturation phase in which legal expansion without operational refinement generates progressively smaller returns. That is the core logic behind the present subsection^{1,2,3}.

The first reason why returns may diminish is that the most immediately available targets are usually hit early. The initial rounds of sanctions tend to capture the most visible banks, strategic exports, transport links, elite-linked assets, and politically straightforward designations. Later rounds then confront a different task: not broad first-order interruption, but the closure of workarounds, the identification of hidden facilitators, and the targeting of more complex networks. The EU's sanctions evolution illustrates this dynamic. By 2025 the regime was no longer defined only by headline listings and first-wave sectoral prohibitions. Later packages increasingly targeted shadow-fleet vessels, third-country enablers, crypto-related actors, special economic zones, and more granular infrastructure and services restrictions. This suggests that the marginal challenge had shifted from breadth to precision. In such a phase, merely increasing the numerical size of the sanctions' regime is less important than increasing its closure quality^{4,5,6}.

The second reason is that a mature sanctions regime tends to become more legally and operationally dense. The Commission's Russia sanctions FAQ page in late 2025 already covered, among other topics, oil imports, import bans on Russian LNG, infrastructure transaction bans, refined products obtained from Russian crude, targeted vessels, enhanced due diligence for Common High Priority items, state-owned enterprises, special economic zones, dual-use and advanced technologies, movements of Russian diplomats, diamonds, and other sector-specific questions. This breadth is a sign of policy maturation, but it is also evidence of rising complexity. As the number of provisions, derogations, sectoral clarifications, and operational interpretations increases, the regime becomes harder to navigate and more resource-intensive to implement. At that point, the addition of further measures may increase formal scope without proportionately increasing strategic pressure. Complexity can therefore become a source of diminishing returns if it is not matched by interpretative clarity, usable guidance, and administrative upgrading^{7,8}.

A third reason concerns enforcement dependence. The Commission's sanctions resources page states that Member States are responsible for implementing and enforcing EU sanctions, identifying breaches, and imposing penalties, while the Commission monitors correct and uniform implementation and provides guidance. The same page also notes that the EU sanctions helpdesk offers cost-free personalised support for sanctions due-diligence checks and that the whistleblower tool can contribute to investigations and increase the effectiveness of EU sanctions. This institutional structure implies that sanctions do not intensify automatically when new legal texts are adopted. Their effect depends on enforcement quality, data-sharing, operator uptake, and monitoring discipline. If legal proliferation outpaces enforcement capacity, the sender coalition may accumulate rules faster than it accumulates

¹ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

² European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

³ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

⁴ Council of the European Union. (2025, May 20). *Russia's war of aggression against Ukraine: EU agrees 17th package of sanctions*.

⁵ Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.

⁶ European Commission. (2025, October 23). *EU adopts 19th package of sanctions against Russia*.

⁷ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.

⁸ European Commission. (n.d.). *Overview of sanctions and related resources*.

real pressure. Under those circumstances, sanctions can continue to expand on paper while yielding progressively weaker marginal returns in practice^{1,2}.

A fourth reason lies in the burden placed on private operators. The EU sanctions regime relies heavily on firms, banks, insurers, freight operators, customs agents, marketplaces, and compliance teams to transform law into effective economic restraint. The Commission's helpdesk architecture is a recognition of that reality. Chatham House's 2025 recommendations on sanctions policy go further and argue that sanctions design, implementation, and enforcement require regular dialogue with affected businesses, that over-compliance is a genuine concern, and that the absence of a strong long-term vision can raise the risk of sanctions fatigue that undermines intended goals. This is particularly relevant to the Russian case. A regime that depends on thousands of private actors can become less effective if compliance burdens are perceived as legally uncertain, commercially excessive, or operationally exhausting. Sanctions fatigue, in this sense, is not only a geopolitical phenomenon among governments; it can also emerge within the private-sector transmission chain on which sanctions depend^{3,4}.

A fifth reason is that sanctions can gradually lose sharpness if their objectives become too diffuse or insufficiently reviewable. Chatham House argues that sanctions should be justified by clear and measurable objectives, that a metric is needed to assess both intended and unintended effects, and that sanctions should be part of a broader strategy rather than a limitless instrument for multiple unrealistic foreign-policy problems. It also warns that sanctions too often remain inflexibly locked in place because of insufficient early planning and lack of policy review if they fail within a defined time to achieve their objectives. This argument is highly applicable to the Russian case. The broader and longer a sanctions regime becomes, the greater the risk that it is sustained by inertia, symbolism, or domestic political signalling rather than by disciplined strategic calibration. Under such conditions, additional sanctions may still look politically forceful while adding less and less marginal strategic value^{5,6}.

A sixth reason is that prolonged sanctions regimes generate the risk of political fatigue inside the sender coalition. The concept itself is not new. Joy Gordon's discussion of the evolution of targeted sanctions recalls that, in the UN context, prolonged sanctions against Iraq contributed to considerable "sanctions fatigue" and to growing doubts about effectiveness, implementation, and humanitarian impact. The historical analogy should not be applied mechanically to the EU-Russia case, which is institutionally and politically very different. However, it remains useful in one respect: it reminds us that long sanctions regimes tend to accumulate questions about proportionality, efficacy, collateral effects, and policy exit conditions. In the Russia case, the risk is not necessarily abrupt abandonment of sanctions, but a slower process in which support for further tightening becomes harder to mobilise unless new measures are clearly justified, enforceable, and strategically meaningful. Sanctions fatigue is therefore best understood as a risk of political and administrative erosion, not necessarily of outright repeal^{7,8}.

A seventh reason is that diminishing returns can emerge even when sanctions are still causing real damage. The problem is not that pressure disappears, but that the target's most important adaptation channels become more resilient over time, while the sender's easiest escalation options are increasingly exhausted. In that situation, maintaining the same level of strategic impact requires more refined and more expensive enforcement work: better beneficial-ownership transparency, tighter customs intelligence, closer work with third countries, sharper maritime monitoring, more precise due diligence, and stronger criminal enforcement against violators. The European Parliament's 2025 briefing makes exactly this point in practice by emphasising implementation challenges, loophole closure, anti-

¹ European Commission. (2025, June 11). *Sanctions implementation*.

² European Commission. (n.d.). *Overview of sanctions and related resources*.

³ Ibid.

⁴ Mulder, N., Solomon, T., Erbland, J., Portela, C., Moret, E., Harris, K., & Early, B. (2025, July 14). *Understanding and improving sanctions today: Recommendations*. Chatham House.

⁵ Ibid.

⁶ European Parliament. (2024, April). *EU sanctions: A key foreign and security policy instrument*.

⁷ Gordon, J. (2011). *Smart Sanctions Revisited*. *Ethics & International Affairs*, 25(3), 315–335.

⁸ Mulder, N., Solomon, T., Erbland, J., Portela, C., Moret, E., Harris, K., & Early, B. (2025, July 14). *Understanding and improving sanctions today: Recommendations*. Chatham House.

circumvention diplomacy, and the need to address Russia’s shadow fleet. In other words, later-stage sanctions success depends less on dramatic new announcements and more on institutional quality. If that quality does not improve, diminishing returns become likely even while the regime remains formally broad^{1,2,3}.

This leads to the key analytical implication of the subsection. The danger is not that the EU has already reached a point where sanctions no longer matter, but that the sanctions regime could gradually become less efficient if further expansion is not accompanied by refinement, enforcement upgrading, and monitoring discipline. In practical terms, this means that future effectiveness depends less on the rhetorical politics of “more sanctions” as such than on the technical politics of making existing sanctions harder to evade, easier to implement, and better aligned with realistic objectives. The Chatham House recommendations are again relevant here because they call for annual multi-stakeholder review, objective metrics for both intended and unintended consequences, stronger enforcement culture, and broader strategic planning. The broader lesson is that sanctions are most at risk not when they are challenged openly, but when they are allowed to drift into routine without disciplined reassessment. In that situation, sanctions fatigue and diminishing returns reinforce one another^{4,5,6}.

The conclusion is therefore straightforward. The risk of diminishing returns and sanctions fatigue should be treated as a structural warning, not as a verdict of current irrelevance. Against Russia, the sanctions regime remains strategically meaningful, but its future yield will increasingly depend on qualitative rather than merely quantitative improvement. Additional packages may still be justified, but their value will be highest when they close actual loopholes, strengthen enforcement, reduce exploitable ambiguity, and sustain coalition discipline. If, by contrast, sanctions continue to expand without equivalent gains in clarity, monitoring, and implementation, the Union may face a classic saturation effect: more law, more burden, more symbolism, but less marginal strategic return. That is the real risk identified in this subsection^{7,8,9}.

Table 8.2.4-1. Main pathways through which diminishing returns and sanctions fatigue can emerge in the EU sanctions regime

Risk pathway	How it develops	Why it reduces marginal yield	What is required to counter it
Saturation of easily targetable actors	Early rounds already hit major banks, goods, elites, and visible channels	Later additions affect more indirect or adaptive targets	Better loophole closure and higher targeting precision
Regulatory over-density	More prohibitions, FAQs, sector rules, and derogation logic accumulate over time	Formal expansion outpaces practical usability	Simplification, clearer guidance, better legal drafting
Enforcement lag	New rules are adopted faster than monitoring and criminal enforcement improve	Violations and circumvention persist despite broader law	Stronger enforcement, data-sharing, and transposition discipline

¹ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.
² European Commission. (2025, July 23). *Commission takes action to ensure complete and timely transposition of the Directive on the criminalisation of the violation of Union restrictive measures*.
³ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.
⁴ Ibid.
⁵ European Commission. (n.d.). *Overview of sanctions and related resources*.
⁶ Mulder, N., Solomon, T., Erbland, J., Portela, C., Moret, E., Harris, K., & Early, B. (2025, July 14). *Understanding and improving sanctions today: Recommendations*. Chatham House.
⁷ Ibid.
⁸ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.
⁹ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

Risk pathway	How it develops	Why it reduces marginal yield	What is required to counter it
Private-sector fatigue	Firms face rising due-diligence, screening, and documentation burdens	Compliance quality may become uneven or defensive	Helpdesk support, clearer expectations, dialogue with operators
Objective drift	Sanctions remain in place without clear review metrics or refined goals	Symbolic continuation replaces calibrated strategic design	Periodic review, measurable objectives, plan-B logic
Political fatigue	Support for further tightening becomes harder to sustain over time	Coalition cohesion weakens at the margin	Strong public justification and allied coordination

Authorship: prepared by the author on the basis of official EU institutional materials and other works

Sources:

- European Commission. (n.d.). *Overview of sanctions and related resources*; European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.
- European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.
- Council of the European Union. (2025, May 20). *Russia’s war of aggression against Ukraine: EU agrees 17th package of sanctions*.
- Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.
- Mulder, N., Solomon, T., Erbland, J., Portela, C., Moret, E., Harris, K., & Early, B. (2025, July 14). *Understanding and improving sanctions today: Recommendations*.
- Chatham House; Gordon, J. (2011). *Smart Sanctions Revisited*. *Ethics & International Affairs*, 25(3), 315–335.

8.3. Conditions under which sanctions may contribute to political transformation in the Russian Federation

8.3.1. Political Transformation as an Indirect and Mediated Outcome

Political transformation should not be conceptualised here as an immediate or mechanically predictable consequence of sanctions. The historical and analytical literature does not support the view that sanctions, by themselves, normally trigger rapid regime change in large authoritarian states. In the Russian case, such an expectation would be especially unrealistic. The more defensible proposition is that sanctions may contribute to political transformation indirectly, through the cumulative alteration of state capacity, elite incentives, fiscal room for manoeuvre, technological reproduction, and long-term policy trade-offs. This formulation matters because it distinguishes transformation from instant compellence. A regime may withstand sanctions politically in the short term while still becoming progressively more constrained, more brittle, and more internally costly to sustain over time. Political transformation, in this sense, is better understood as a mediated outcome of prolonged structural pressure than as a direct one-step response to external coercion^{1,2,3}.

The EU’s sanctions rationale is consistent with this more indirect reading. The Commission’s consolidated Russia sanctions FAQ explains that sanctions are aimed at weakening the Russian government’s ability to finance its war of aggression and are calibrated to maximise negative impact on the Russian economy while limiting unnecessary spillovers. The Council’s overview states that the

¹ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

² Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

³ European Commission. (n.d.). *Sanctions adopted following Russia’s military aggression against Ukraine*.

measures are designed to maximise pressure on Russia and diminish its ability to wage its illegal war of aggression. Neither formulation promises immediate regime collapse. Instead, both emphasise capability erosion, resource constraint, and cumulative pressure. This is analytically important because it shows that the most realistic theory of change in the EU framework is already broader than direct compellence. If sanctions reduce the state's fiscal flexibility, technological access, and policy options over time, they may still become politically transformative even without producing a sudden reversal at the top^{1,2}.

This distinction is particularly important in relation to authoritarian resilience. Christian von Soest argues that authoritarian regimes are difficult sanctions targets because they can shield themselves from external pressure through repression, redistribution, narrative control, and “pressure-proofing” strategies. Grauvogel and von Soest further show that sanctions do not automatically produce democratisation and may even strengthen authoritarian rule if the regime successfully incorporates sanctions into its legitimisation strategy. These findings are highly relevant to Russia. They suggest that sanctions pressure may coexist with short-term regime hardening, increased repression, or stronger nationalist framing. Yet this does not mean sanctions are politically irrelevant. It means that their transformative effect, where it exists, is filtered through domestic institutions, elite coalitions, and the regime's adaptive repertoire. Transformation therefore becomes conditional, delayed, and politically mediated rather than direct^{3,4}.

For that reason, sanctions should be seen less as a trigger for immediate rupture and more as a force that can gradually reshape the internal operating environment of the regime. If sanctions compress export earnings, narrow access to technologies, increase fiscal burdens, reduce investment quality, and complicate military-industrial regeneration, they alter the terms on which the state can preserve both external aggression and internal stability. The Brookings analysis by Itskhoki and Ribakova is especially useful here because it emphasises that the impact of sanctions on Russia has been mixed rather than decisive, but also that sanctions work through complex trade-offs and constraints rather than simple one-off shocks. In political terms, this implies that the relevant question is not “Did sanctions topple the regime?” but rather “How do sanctions progressively change the costs, choices, and tensions within the regime?” Once the question is framed in that way, indirect political transformation becomes analytically plausible even where immediate regime change remains unlikely^{5,6}.

One of the most relevant mediating mechanisms is pressure on state capacity. Sanctions do not need to overthrow a regime to make its governing model harder to sustain. They can constrain budgetary flexibility, worsen import quality, increase procurement frictions, raise logistics costs, and force the state to devote growing resources to substitution, compensation, and repression. Over time, such pressures can narrow the state's discretionary space and intensify trade-offs between warfare, elite maintenance, regional transfers, and social commitments. In the Russia-focused Chatham House volume *Imagining Russia's future after Putin*, one line of analysis explicitly suggests that the cumulative impact of sanctions could squeeze the rent flows available to decision-makers, creating evidence of stress through competition for rents among elite groups and forced sequestration of budgetary spending. This does not prove transformation. However, it identifies a credible pathway through which

¹ European Commission. (n.d.). *Consolidated version of the frequently asked questions concerning sanctions adopted following Russia's military aggression against Ukraine and Belarus' involvement in it.*

² Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions.*

³ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure.* GIGA Working Paper No. 336.

⁴ Grauvogel, J., & von Soest, C. (2014). *Claims to legitimacy count: Why sanctions fail to instigate democratisation in authoritarian regimes.* *European Journal of Political Research*, 53(4), 635–653.

⁵ European Parliament. (2024, April). *EU sanctions: A key foreign and security policy instrument.*

⁶ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice.* *Brookings Papers on Economic Activity*, Fall, 425–497.

sanctions can contribute to political change indirectly, by eroding the material foundations that support elite cohesion and central control^{1,2}.

A second mediating mechanism concerns elite calculations. Political transformation in authoritarian systems rarely occurs through mass suffering alone. Much more often, it depends on whether elites continue to believe that the regime can reliably protect their rents, status, security, and future prospects. Sanctions may matter here by shrinking the pool of resources available for elite balancing, raising uncertainty about external access, constraining financial and commercial channels, and increasing the cost of strategic dependence on a narrower set of partners. Again, this is not a linear process. Elites may initially rally around the regime under pressure. However, over time, persistent constraints can alter perceptions of regime competence, durability, and strategic viability. The indirect transformative role of sanctions therefore lies partly in how they reshape elite expectations and trade-offs, not merely in how they affect GDP or household welfare^{3,4}.

A third mediating mechanism is strategic narrowing. Even where a regime remains politically intact, sanctions can reduce the range of acceptable long-term options available to it. If access to advanced technology, specialised services, insurance, finance, shipping, and energy-related revenue channels becomes progressively worse, then the regime may retain coercive power while losing strategic flexibility. This matters because political transformation is not only about leadership turnover or democratisation. It may also involve changes in the regime's external posture, internal balance of priorities, institutional hardening, or long-term capacity for continued geopolitical confrontation. A sanctioned state that can still endure may nevertheless be transformed into a more closed, more extractive, more repressive, and more resource-constrained system. That outcome is not normatively identical to liberal transformation, but it is still a form of political change produced under cumulative external pressure^{5,6}.

At the same time, this mediated understanding also requires caution. The literature does not support any automatic assumption that cumulative pressure will necessarily produce liberalisation or democratic opening. Grauvogel and von Soest explicitly warn that authoritarian regimes can survive sanctions by incorporating them into their legitimacy narratives. Von Soest likewise emphasises authoritarian "pressure-proofing" through repression, redistribution, and external support. In the Russian case, this means that sanctions could contribute not to liberal transformation but to deeper authoritarian consolidation if the regime successfully reallocates burdens, suppresses dissent, and reframes the conflict as a civilisational confrontation with the West. This possibility is not a marginal caveat; it is central to the analytical balance of this section. Sanctions may be transformative without being democratising. They may change the regime's internal configuration, but not in the direction hoped for by external actors^{7,8}.

The most defensible conclusion is therefore that sanctions may contribute to political transformation in Russia only as part of a broader and slower causal chain. They can weaken state capacity, squeeze rent flows, complicate elite management, narrow strategic options, and intensify long-term governance trade-offs. But whether these pressures lead to meaningful political transformation depends on how they interact with military developments, domestic repression, social endurance, elite cohesion, and external support networks. Sanctions are thus neither irrelevant nor sufficient. Their political role is

¹ Ibid.

² Allen, D. (2023, May 24). *Imagining Russia's future after Putin: The economic system by end-2027*. Chatham House.

³ Ibid.

⁴ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

⁵ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

⁶ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

⁷ Grauvogel, J., & von Soest, C. (2014). *Claims to legitimacy count: Why sanctions fail to instigate democratisation in authoritarian regimes*. *European Journal of Political Research*, 53(4), 635–653.

⁸ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

mediated, cumulative, and conditional. That is why the next subsection should examine more specifically the channels through which transformative influence may operate—fiscal, technological, institutional, and elite-level—rather than treating “political transformation” as a single and immediate outcome^{1,2,3}.

Table 8.3.1-1. Political transformation under sanctions: direct versus indirect logic

Analytical model	Core assumption	Typical expectation	Relevance to the Russian case	Judgement
Direct coercive model	Sanctions rapidly force policy reversal or regime change	Quick concession under external pressure	Weak fit: Russia is a large adaptive authoritarian state with pressure-proofing capacity	Limited explanatory value
Indirect structural model	Sanctions gradually alter state capacity, elite incentives, and strategic trade-offs	Delayed, mediated transformation through cumulative strain	Stronger fit: explains why change, if it comes, is likely to be gradual and conditional	High explanatory value
Authoritarian hardening model	Sanctions reinforce repression and legitimising narratives	Regime consolidation rather than opening	Also plausible in the Russian case	Important counter-scenario
Mixed-pathway model	Sanctions generate both stress and hardening, with outcomes depending on mediation factors	Transformation possible, but neither automatic nor linear	Best fit for current evidence	Most analytically defensible

Authorship: prepared by the author on the basis of official EU institutional materials and other works

Sources:

- European Commission. (n.d.). Sanctions adopted following Russia’s military aggression against Ukraine.
- Giumelli, F. (2024). A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia.
- Itskhoki, O., & Ribakova, E. (2024). The Economics of Sanctions: From Theory into Practice.
- von Soest, C. (2023, September). How Authoritarian Regimes Counter International Sanctions Pressure.
- Grauvogel, J., & von Soest, C. (2014). Claims to legitimacy count: Why sanctions fail to instigate democratisation in authoritarian regimes.
- Allen, D. (2023, May 24). Imagining Russia’s future after Putin: The economic system by end-2027.

8.3.2. Channels of Transformative Influence: Fiscal, Technological, Institutional, and Elite-Level

If sanctions are to contribute to political transformation in the Russian Federation, they are unlikely to do so through a single direct political mechanism. The more plausible pathway is cumulative and channel-specific. In practical terms, sanctions can matter politically when they squeeze the fiscal base of the state, degrade the technological conditions of military and industrial reproduction, reshape institutional patterns of governance, and alter elite incentives and expectations. This does not mean that transformation is guaranteed. It means that the most credible theory of change lies in how these channels interact over time. The EU’s sanctions framing already points in this direction: the measures are presented as tools to weaken Russia’s economic base, deprive it of critical technologies and markets, and curtail its ability to wage war, rather than as a promise of instant regime change^{4,5,6}.

¹ European Commission. (n.d.). *Sanctions adopted following Russia’s military aggression against Ukraine*.

² Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

³ Allen, D. (2023, May 24). *Imagining Russia’s future after Putin: The economic system by end-2027*. Chatham House.

⁴ European Commission. (n.d.). *Sanctions adopted following Russia’s military aggression against Ukraine*.

⁵ Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.

⁶ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

The first channel is fiscal. A regime whose external aggression depends heavily on hydrocarbon revenues, sovereign reserves, and the political management of rents is vulnerable not necessarily to immediate collapse, but to a gradual narrowing of fiscal room for manoeuvre. The EU's 18th package is explicit on this point: it states that oil exports still represent one third of Russian government revenues and lowers the oil price cap from USD 60 to USD 47.6 per barrel as part of a broader effort to curtail Russia's energy revenues. At the same time, the European Parliament reported in late 2025 that the EU had immobilised around EUR 210 billion of Russian sovereign assets and frozen around EUR 28 billion of private assets within its jurisdiction. These measures do not automatically bankrupt the Russian state, but they do constrain buffers, reduce flexibility, and worsen the long-term fiscal conditions under which the regime manages war, patronage, and domestic stabilisation. In transformative terms, fiscal pressure matters because it can intensify trade-offs between military expenditure, elite maintenance, regional transfers, and social obligations^{1,2,3}.

This fiscal channel becomes more politically significant when viewed through the internal structure of the Russian political economy. Chatham House's analysis of Russia's future after Putin describes the system as a state-dominated mechanism of rent distribution in which export-oriented sectors, especially oil and gas, support budget-funded spheres, security functions, and broader regime maintenance. The same analysis argues that, over time, sanctions on crude oil and petroleum products could squeeze the rent flows available to decision-makers, with possible signs of stress including competition for rents among elite groups and even forced sequestration of federal and regional budgetary spending. This is analytically important because it translates macroeconomic pressure into political terms. A fiscal squeeze becomes politically transformative not simply when revenues fall, but when the regime becomes less able to distribute rents in ways that preserve elite balance and administrative loyalty. In that sense, the fiscal channel links directly to longer-term questions of governability^{4,5}.

The second channel is technological. The EU has increasingly framed sanctions not merely as restrictions on trade in general, but as an effort to deny Russia access to goods, technologies, and services that are critical to military and industrial reproduction. The Commission's official list of Common High Priority items defines them as prohibited dual-use goods and advanced technology items used in Russian military systems found on the battlefield in Ukraine or critical to the development, production, or use of those systems. The 17th package built on this logic by targeting more than 45 companies and individuals supplying the Russian army with drones, weapons, ammunition, military equipment, critical components, and logistical support, including industrial enablers such as Russian and Chinese entities supplying machine tools. The relevance of this channel for political transformation lies in time horizon. Technological degradation rarely produces an immediate political shock, but it can progressively worsen the quality, cost, and speed of military-industrial reproduction, thereby constraining strategic options and exposing deeper institutional weaknesses over time^{6,7,8}.

The technological channel also matters because it changes the form of dependence. The more Russia must rely on lower-quality substitutes, indirect procurement, longer logistics chains, or a narrower group of external suppliers, the more its strategic autonomy is reduced even if production continues. Brookings' analysis of sanctions on Russia argues that the effects have been mixed, but it also stresses the importance of implementation design and the fact that sanctions work through complex constraints

¹ Council of the European Union. (2025, July 18). *Russia's war of aggression against Ukraine: EU adopts 18th package of economic and individual measures*.

² European Parliament. (2025, November). *EU sanctions and Russia's frozen assets*.

³ European Parliament. (2025). *Immobilised Russian central bank assets*.

⁴ Allen, D. (2023, May 24). *Imagining Russia's future after Putin: The economic system by end-2027*. Chatham House.

⁵ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

⁶ European Commission. (2024, February 22). *List of common high priority items*.

⁷ Council of the European Union. (2025, May 20). *Russia's war of aggression against Ukraine: EU agrees 17th package of sanctions*.

⁸ European Commission. (2025, May 20). *EU adopts 17th package of sanctions against Russia*.

and trade-offs rather than through a single macroeconomic outcome. In political terms, this means that technological sanctions may not force concession directly, but they can contribute to transformation by reducing external manoeuvrability and increasing the long-term cost of maintaining a militarised and technologically demanding foreign policy. The effect here is cumulative rather than spectacular. It is less about collapse than about the gradual narrowing of what the regime can sustain at acceptable cost^{1,2}.

The third channel is institutional. Here the likely effect is not immediate liberalisation, but a reconfiguration of governance structures under pressure. Drawing on Allen's analysis of Russia's state-dominated rent-management system, the most plausible institutional effect of prolonged sanctions is a deeper shift towards centralised allocation, militarised prioritisation, import-substitution management, and emergency-style coordination across the economy. This is an inference, but it is a grounded one. If sanctions reduce Western economic ties, squeeze access to external finance and technology, and force heavier reliance on politically managed substitutes and non-Western channels, then the internal institutional response is likely to be more dirigiste rather than less. Such a shift may harden authoritarian governance in the short run. Yet it may also become transformative in a broader sense by changing the structure of state-business relations, increasing dependence on administrative allocation, and reducing the regime's long-term flexibility. Political transformation, in this institutional channel, therefore does not necessarily mean democratisation. It can mean structural mutation of the governing model itself^{3,4}.

A second institutional dimension concerns the external legal-financial environment within which Russian state power operates. The immobilisation of approximately EUR 210 billion of Russian central bank assets in EU jurisdictions, together with the debate and policy mechanisms surrounding the use of extraordinary profits from those assets for Ukraine, has not changed ownership of the assets, but it has altered the practical conditions of Russian reserve usage and sovereign financial insulation. This matters because political systems are shaped not only by internal institutions, but also by their access to external financial infrastructure. A regime forced to operate with more constrained reserve access, reduced legal comfort in major jurisdictions, and a more hostile international financial environment may adapt institutionally through tighter internal control and narrower strategic planning horizons. Again, this is not immediate political transformation in the everyday sense. However, it is a channel through which the sanctions regime can push long-term institutional change in how the Russian state manages risk, reserves, and strategic dependence^{5,6,7}.

The fourth channel is elite-level. This is perhaps the most politically sensitive channel because authoritarian systems are often more responsive to shifts in elite incentives than to diffuse social hardship. The EU's individual sanctions regime is designed precisely to shape this layer: by March 2025, sanctions applied to nearly 2,400 individuals and entities, and the 17th package stated that, with 75 new listings, the total rose to over 2,400; the 19th package then added a further 69 individual listings. These measures include travel restrictions, asset freezes, and prohibitions on making funds or economic resources available to listed persons and entities. Their transformative significance lies not in symbolic naming alone, but in how they can narrow external financial access, reduce status mobility, complicate commercial intermediation, and raise the personal cost of continued regime alignment for some actors.

¹ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

² European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

³ Allen, D. (2023, May 24). *Imagining Russia's future after Putin: The economic system by end-2027*. Chatham House.

⁴ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

⁵ European Parliament. (2025, November). *EU sanctions and Russia's frozen assets*.

⁶ European Parliament. (2025). *Confiscation of immobilised Russian sovereign assets*.

⁷ European Parliament. (2025). *Immobilised Russian central bank assets*.

They do not automatically fracture the elite. However, they do increase the possibility that different elite groups reassess the long-term value, risk, and sustainability of the existing political course^{1,2,3}.

The elite-level channel becomes stronger when combined with the fiscal channel. Allen's Chatham House analysis is especially useful here because it explicitly links sanctions pressure to the possibility of competition for rents among elite groups and forced budget sequestration. This is a crucial bridge between economic restriction and political transformation. A sanctioned authoritarian regime may endure severe external pressure so long as it can still distribute benefits, manage losses selectively, and preserve confidence among politically relevant insiders. But if sanctions progressively squeeze fiscal resources, degrade external access, and reduce the regime's capacity to stabilise expectations among elites, then political effects become more plausible. The mechanism is still indirect. Yet it is more realistic than expecting sanctions to produce mass protest leading directly to leadership change. Under Russian conditions, elite recalculation is likely to matter more than immediate societal upheaval^{4,5}.

The most important analytical point is that these four channels do not operate separately. Fiscal pressure without technological degradation can be partly offset by adaptation. Technological degradation without institutional consequences may remain sectoral rather than political. Institutional change without elite recalculation may only harden the regime. Elite strain without fiscal pressure may remain manageable. Transformative influence becomes more plausible only where these channels reinforce one another over time. This is also why the EU's later sanctions policy has increasingly focused on cumulative pressure, anti-circumvention, CHP items, energy revenues, shadow logistics, and high-value intermediaries rather than on isolated symbolic acts. The more these channels interact, the more sanctions can reshape the internal balance of costs and choices inside the Russian system^{6,7,8}.

The conclusion of this subsection is therefore clear. If sanctions contribute to political transformation in Russia, they are most likely to do so through four interacting channels: fiscal strain, technological degradation, institutional mutation, and elite-level recalculation. None of these channels guarantees transformation on its own, and each can also generate defensive adaptation or authoritarian hardening. Yet together they provide the most plausible causal map of how sanctions might matter politically over the medium and long term. The next subsection should therefore identify the specific conditions under which these channels could become strong enough to produce real transformative impact rather than only constraint and adaptation^{9,10,11}.

¹ Council of the European Union. (2025, March 14). *Russia's war of aggression against Ukraine: EU individual sanctions over territorial integrity prolonged for a further six months*.

² Council of the European Union. (2025, May 20). *Russia's war of aggression against Ukraine: EU agrees 17th package of sanctions*.

³ Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.

⁴ Allen, D. (2023, May 24). *Imagining Russia's future after Putin: The economic system by end-2027*. Chatham House.

⁵ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

⁶ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

⁷ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

⁸ European Commission. (2024, February 22). *List of common high priority items*.

⁹ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

¹⁰ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

¹¹ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

Table 8.3.2-1. Main channels through which sanctions may contribute to political transformation in the Russian Federation

Channel	Immediate effect	Mediated political effect	Why it matters for transformation
Fiscal	Reduced energy revenue quality, immobilised reserves, tighter budget trade-offs	Harder rent distribution, narrower room for warfare-social balance, stress in budget allocation	Can weaken the material basis of elite cohesion and state flexibility
Technological	Reduced access to critical goods, dual-use items, machine tools, and advanced components	Higher reproduction costs, lower-quality substitution, reduced strategic autonomy	Constrains long-term military-industrial and economic sustainability
Institutional	Greater reliance on central allocation, substitution management, emergency governance, and narrower external financial space	Mutation of the governing model, deeper centralisation, lower flexibility	Can alter the structure of the regime even without immediate liberalisation
Elite-level	Asset freezes, travel bans, reduced external access, tighter financial scrutiny	Reassessment of regime competence, growing competition for rents, rising uncertainty among insiders	Most plausible direct political transmission channel in an authoritarian system

Authorship: prepared by the author on the basis of official EU institutional materials and other works

Sources:

- European Union. (2025, July 18). Russia’s war of aggression against Ukraine: EU adopts 18th package of economic and individual measures.
- European Parliament. (2025, November). EU sanctions and Russia’s frozen assets.
- European Commission. (2024, February 22). List of common high priority items.
- Council of the European Union. (2025, May 20). Russia’s war of aggression against Ukraine: EU agrees 17th package of sanctions.
- Council of the European Union. (2025, October 23). 19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers.
- Allen, D. (2023, May 24). Imagining Russia’s future after Putin: The economic system by end-2027.

8.3.3. Necessary Conditions for Transformative Impact

If sanctions are to contribute to meaningful political transformation in the Russian Federation, that effect will not arise automatically from the mere existence of a broad sanctions’ regime. The experience of 2022–2025 suggests instead that transformative impact depends on a demanding set of cumulative conditions. Sanctions may generate pressure, but pressure becomes politically transformative only if it is sustained, transmitted, enforced, and strategically concentrated over time. This is especially true in relation to a large adaptive authoritarian state, where short-term pain can be absorbed, socially redistributed, and politically reframed. The decisive issue is therefore not whether sanctions exist, but whether the regime possesses the durability and quality necessary to alter the long-term internal balance of costs, options, and expectations. In the Russian case, at least six conditions stand out as essential: coalition unity, anti-circumvention effectiveness, legal resilience, high-quality compliance, durable restrictions on technology and services, and cumulative domestic stress of a politically meaningful kind^{1,2,3}.

The first condition is sustained coalition unity. Transformative pressure requires sanctions to remain politically durable over a sufficiently long period to influence state capacity, elite calculations, and institutional trade-offs inside Russia. This is only possible if the EU and its partners continue to act with broad strategic coherence. The Council’s sanctions pages repeatedly frame the measures as part of a continuing effort to maximise pressure on Russia, while the European Parliament’s 2025 briefing

¹ Ibid.

² European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

³ Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.

stresses the importance of reinforced cooperation with like-minded jurisdictions and of sanctions diplomacy vis-à-vis third countries. This matters because a fragmented coalition produces leakier sanctions, weaker signalling, and lower expectations of endurance in the target state. A regime that expects sanctions unity to erode has a stronger incentive to wait out the pressure rather than adapt politically to it. Coalition unity is therefore not simply a background diplomatic virtue. It is a core precondition for transformation because it shapes the target's time horizon and its confidence in strategic endurance^{1,2,3}.

The second condition is effective anti-circumvention pressure. A sanctions regime cannot become transformative if the target preserves wide external operating space through re-routing, proxy structures, shadow logistics, and third-country facilitators. The European Parliament's 2025 state-of-play briefing explicitly states that the unprecedented nature of the Russia sanctions has created implementation challenges and that the EU renewed efforts to close loopholes and prevent circumvention, including by reinforcing cooperation with third countries and addressing the shadow fleet. The Council's 17th and 19th package press releases show how central this issue had become by 2025, with hundreds of shadow-fleet vessels targeted and additional measures imposed on enablers, registries, and reinsurers. These developments indicate that transformative impact depends not only on the original sanctions' lists, but on the ability to deny Russia stable adaptation channels. If circumvention remains broad and cheap, then sanctions may still impose costs but are less likely to accumulate into politically transformative stress^{4,5,6}.

The third condition is legal resilience. Sanctions that are politically ambitious but legally fragile are less likely to shape long-term transformation because they create uncertainty, litigation exposure, and implementation hesitancy. The EU's sanctions architecture has increasingly moved towards stronger legal consolidation, and Directive (EU) 2024/1226 is central here because it harmonises the criminalisation of sanctions violations across Member States. Yet the Commission's infringement action in July 2025 over incomplete transposition of that directive also showed that legal resilience is not automatic. For sanctions to become transformative, the legal framework must remain precise, enforceable, and capable of surviving administrative and judicial stress over time. A regime that is repeatedly contested, unevenly transposed, or weakly criminalised may still inconvenience the target, but it is less likely to create durable expectations of constraint. Legal resilience therefore matters not only for formal rule-of-law reasons, but because it shapes the credibility of sanctions as a long-term political environment^{7,8,9}.

The fourth condition is high-quality compliance transmission. Even a legally sound sanctions regime cannot become transformative if it remains weakly transmitted into real commercial, financial, logistical, and administrative behaviour. The Commission's sanctions resources page states that Member States are responsible for implementation and enforcement, while the Commission monitors correct and uniform implementation and provides guidance. The Commission's June 2025 implementation note and its Helpdesk support for operators, especially SMEs, both show that sanctions effectiveness increasingly depends on practical usability, screening quality, due diligence, ownership verification, and the ability of thousands of public and private actors to internalise restrictions in daily decisions. This matters because transformation cannot occur through paper law alone. It requires

¹ Council of the European Union. (n.d.). *Russia's war against Ukraine: EU sanctions*.

² Council of the European Union. (n.d.). *How the EU adopts and reviews sanctions*.

³ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

⁴ Ibid.

⁵ Council of the European Union. (2025, May 20). *Russia's war of aggression against Ukraine: EU agrees 17th package of sanctions*.

⁶ Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.

⁷ European Union. (2024, April 24). *Directive (EU) 2024/1226 on the definition of criminal offences and penalties for the violation of Union restrictive measures*.

⁸ European Commission. (2025, July 23). *Commission takes action to ensure complete and timely transposition of the Directive on the criminalisation of the violation of Union restrictive measures*.

⁹ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.

sustained behavioural filtering at the level of payments, shipments, procurement, insurance, contracting, and export controls. High-quality compliance is therefore not a technical afterthought. It is one of the essential mechanisms through which cumulative pressure becomes politically meaningful over time^{1,2,3}.

The fifth condition is durable restriction on critical technologies and services. Political transformation is unlikely if Russia can continue, with manageable cost, to reproduce military and industrial capabilities through substitute supply chains or to access the services necessary for external strategic functioning. The Commission's Common High Priority items list and the FAQ and guidance architecture around enhanced due diligence show that the EU increasingly recognises the centrality of battlefield-relevant technologies and re-export risks. The Council's 17th package also targeted companies supplying machine tools, drones, and other critical components to the Russian military system. This is essential because, in authoritarian systems, transformative pressure is more likely when sanctions constrain future capability reproduction rather than merely impose immediate discomfort. Durable technology and service restrictions can degrade strategic autonomy, worsen long-term planning horizons, and intensify the cost of maintaining militarised external policy. Without that sustained technological and service denial, sanctions may remain costly but insufficiently transformative^{4,5,6}.

The sixth condition is cumulative domestic stress with political relevance, not merely aggregate hardship. This distinction is crucial. Sanctions do not become transformative simply because they reduce welfare or slow growth. In authoritarian systems, diffuse social suffering can often be repressed, narrated away, or redistributed. What matters is whether sanctions generate stress that reaches state capacity, elite balancing, fiscal trade-offs, and institutional coherence. Allen's Chatham House analysis is particularly useful here because it links sanctions pressure to possible competition for rents among elite groups and to forced sequestration of federal and regional budget spending. That is a much more plausible mechanism of transformation than a simplistic expectation of immediate mass protest. Political transformation becomes more likely when domestic stress affects the internal architecture of regime management, not merely the aggregate economy^{7,8}.

A seventh condition, closely related to the previous six, is strategic patience on the sender side. The literature reviewed by Giumelli and the economic analysis by Itskhoki and Ribakova both caution against simplistic readings of sanctions effectiveness. In the Russian case, the most plausible transformative pathways are medium- and long-term. This means that sender governments must maintain sanctions discipline beyond the initial shock period, even when early expectations of quick compellence are disappointed. A sanctions regime that is relaxed too soon, allowed to drift, or sustained only symbolically will struggle to produce transformative consequences. By contrast, a regime that is consistently reviewed, adapted, and reinforced in response to circumvention and technological substitution is more likely to accumulate pressure in politically meaningful ways. Strategic patience is therefore not passivity. It is the continued political will to sustain costly but cumulative pressure over time^{9,10,11}.

¹ European Commission. (n.d.). *Overview of sanctions and related resources*.

² European Commission. (2025, June 11). *Sanctions implementation*.

³ European Commission. (2026, January 27). *Real SMEs, real sanctions compliance stories*.

⁴ European Commission. (2024, February 22). *List of common high priority items*.

⁵ European Commission. (2025, July 23). *Enhanced due diligence for operators manufacturing and/or trading with CHP items: Frequently asked questions*.

⁶ Council of the European Union. (2025, May 20). *Russia's war of aggression against Ukraine: EU agrees 17th package of sanctions*.

⁷ Allen, D. (2023, May 24). *Imagining Russia's future after Putin: The economic system by end-2027*. Chatham House.

⁸ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

⁹ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

¹⁰ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

¹¹ Council of the European Union. (n.d.). *Timeline - EU sanctions against Russia*.

At the same time, these conditions must be treated jointly rather than individually. Coalition unity without anti-circumvention effectiveness will leave too much external space for adaptation. Legal resilience without compliance quality will yield impressive texts but weak transmission. Technology denial without fiscal pressure may slow the target without creating politically meaningful strain. Domestic stress without elite relevance may harden repression rather than transform the regime. The significance of these conditions lies precisely in their interaction. Transformative impact becomes plausible only when the sanctions regime is politically durable, legally robust, practically enforceable, strategically focused, and capable of generating internal pressures that are difficult for the regime to absorb indefinitely. That is a very demanding threshold, but it is the correct one analytically^{1,2,3}.

The conclusion of this subsection is therefore precise. Sanctions can become a factor of real political transformation in Russia only under conditions of sustained coalition unity, effective anti-circumvention pressure, legal resilience, high-quality compliance, durable restrictions on technology and services, and cumulative domestic stress that affects regime management rather than merely aggregate welfare. These are not guaranteed conditions, and several of them remain only partially fulfilled. But together they define the threshold that would have to be crossed for sanctions pressure to move from attritional constraint to transformative political effect. The next subsection should therefore identify the circumstances under which transformative expectations should be treated with caution, even if some of these conditions are partially present^{4,5,6}.

Table 8.3.3-1. Necessary conditions under which sanctions may contribute to political transformation in the Russian Federation

Condition	What it requires in practice	Why it matters for transformative impact	If absent, what happens instead
Sustained coalition unity	Continued EU and partner alignment over time	Convinces the target that pressure will endure and cannot simply be waited out	Adaptation and expectation of coalition fatigue
Effective anti-circumvention pressure	Closure of loopholes, pressure on shadow fleet, third-country outreach, enabler targeting	Reduces Russia’s external operating space and raises adaptation costs	Pressure leaks through re-routing and proxy channels
Legal resilience	Clear rules, durable listings, criminalisation of violations, consistent transposition	Makes sanctions credible, enforceable, and resistant to erosion	Litigation, fragmentation, and lower deterrence
High-quality compliance	Strong screening, due diligence, ownership checks, operator uptake, enforcement discipline	Translates formal restrictions into real behavioural constraint	Paper sanctions with weak transmission
Durable technology and services restrictions	Persistent denial of CHP items, critical components, specialised services, and enablers	Degrades future capability reproduction and narrows strategic autonomy	Short-term substitution and lower long-term pressure
Cumulative domestic stress	Pressure that affects budgets, rents, elite balancing, and institutional coherence	Creates politically relevant internal trade-offs	Diffuse hardship without transformative political consequences

Authorship: prepared by the author on the basis of official EU institutional materials and other works

Sources:

- Council of the European Union. (n.d.). *Russia’s war against Ukraine: EU sanctions*.

¹ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

² European Commission. (n.d.). *Overview of sanctions and related resources*.

³ Allen, D. (2023, May 24). *Imagining Russia’s future after Putin: The economic system by end-2027*. Chatham House.

⁴ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

⁵ European Commission. (n.d.). *Sanctions adopted following Russia’s military aggression against Ukraine*.

⁶ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

- European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.
- European Union. (2024, April 24). *Directive (EU) 2024/1226 on the definition of criminal offences and penalties for the violation of Union restrictive measures*.
- European Commission. (2025, June 11). *Sanctions implementation*.
- European Commission. (2024, February 22). *List of common high priority items*.
- European Commission. (2025, July 23). *Enhanced due diligence for operators manufacturing and/or trading with CHP items: Frequently asked questions*.
- Allen, D. (2023, May 24). *Imagining Russia's future after Putin: The economic system by end-2027*.
- von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*.

8.3.4. Conditions under which Transformative Expectations Should Be Treated with Caution

Transformative expectations regarding the political effects of sanctions on the Russian Federation should be treated with caution whenever analysis begins to assume that economic pressure will automatically convert into regime change, policy liberalisation, or elite fragmentation. The literature reviewed in this report does not support such automaticity. On the contrary, the most serious work on sanctions and authoritarian rule suggests that pressure can generate contradictory outcomes, including regime hardening, narrative consolidation, and more selective redistribution rather than meaningful political opening. In the Russian case, caution is especially necessary because the target is not a small, externally dependent polity but a large authoritarian state with coercive capacity, strategic exports, and a demonstrated ability to absorb and redirect costs. This means that sanctions can remain strategically meaningful while still falling short of transformative political effect. The correct analytical stance is therefore conditional rather than deterministic^{1,2,3}.

The first cautionary condition is high regime adaptability. Expectations of transformation should be limited where the sanctioned state still demonstrates a substantial ability to re-route trade, substitute suppliers, mobilise domestic controls, and redesign external channels of access. The European Parliament's 2025 briefing on EU sanctions against Russia states that the unprecedented nature of the measures created significant implementation challenges and required renewed efforts to close loopholes, reinforce cooperation with third countries, and address the shadow fleet. That formulation is important because it implicitly acknowledges that the target has retained meaningful room for manoeuvre. A regime that can continue operating through alternative channels may still be pressured, but it is less likely to be transformed quickly. In such circumstances, sanctions remain attritional rather than decisively political in their immediate effects^{4,5}.

The second cautionary condition is the regime's ability to transfer costs onto society while insulating politically decisive actors. Authoritarian systems do not experience sanctions as socially flat pressure. Von Soest's analysis of authoritarian "pressure-proofing" explicitly identifies redistribution to elites, loyal constituencies, and politically strategic groups as a central way in which regimes counter external pressure. This matters because sanctions do not become transformative simply by making ordinary life harder. They matter politically only when costs affect the internal architecture of regime maintenance. If the state retains enough capacity to protect security institutions, politically central rent networks, and the administrative core while shifting hardship onto broader society, then sanctions may produce pain

¹ Ibid.

² Grauvogel, J., & von Soest, C. (2014). *Claims to legitimacy count: Why sanctions fail to instigate democratisation in authoritarian regimes*. *European Journal of Political Research*, 53(4), 635–653.

³ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

⁴ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

⁵ Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.

without producing transformation. Under such conditions, expectations of political opening should be kept modest^{1,2}.

The third cautionary condition is deepened authoritarian consolidation. Transformative expectations should be limited where sanctions can be incorporated into the regime's strategy of legitimisation, mobilisation, and coercive centralisation. Grauvogel and von Soest show that sanctions can strengthen authoritarian rule if the regime manages to integrate their existence into its legitimisation strategy. Von Soest's later working paper develops the same point further by showing how authoritarian governments respond to sanctions through repression, co-optation, and narrative framing. In the Russian case, this implies that sanctions pressure may initially contribute not to liberalisation but to harder ideological closure, intensified control of information, and the reinforcement of a sovereignty-under-siege narrative. If the regime succeeds in translating external pressure into internal political cohesion among key supporters, then transformative expectations should be reduced accordingly^{3,4}.

The fourth cautionary condition is the continued availability of external support and intermediary channels. Transformative expectations should be restrained whenever the target retains broad access to third-country facilitation, shadow logistics, re-export channels, or alternative service ecosystems. The European Parliament's 2025 briefing and the Council's later sanctions communications make clear that, by 2025, circumvention via third countries and the shadow fleet had become one of the central operational challenges of the sanctions' regime. This is not a minor implementation issue. It means that Russia's external operating space, while narrowed, was not closed. As long as that remains true, sanctions are less likely to generate the kind of cumulative internal stress necessary for transformation. They may still degrade capacity and increase costs, but they do so in a more indirect and slower way^{5,6,7}.

The fifth cautionary condition is insufficient enforcement convergence inside the sender coalition. Transformative expectations should be limited where the sanctions regime remains formally broad but unevenly implemented. The European Parliament's 2023 study on implementation and monitoring emphasised that enforcement within the EU had developed through a highly decentralised structure and warned of practical confusion and contradictory legal interpretations across Member States. The Commission's July 2025 infringement action over incomplete transposition of Directive (EU) 2024/1226 added a fresh illustration of the same problem: even after agreement on stronger criminal-law tools, implementation remained incomplete across a large number of Member States. This is highly relevant to the question of transformation. A target state is less likely to revise its long-term political calculus if it perceives that sanctions are not uniformly enforced, that legal risks remain uneven, or that the sender coalition is still struggling to translate common rules into convergent practice^{8,9}.

The sixth cautionary condition is mixed empirical impact. Expectations of political transformation should be moderated whenever the sanctions record still shows significant pressure but not overwhelming systemic breakdown. The Brookings analysis by Itskhoki and Ribakova is especially relevant here because it argues that the impact of the unprecedented post-2022 sanctions on Russia has so far been mixed and has not significantly altered Russia's behaviour. This finding does not imply that sanctions have failed. It implies that the pathway from economic pressure to political

¹ Allen, D. (2023, May 24). *Imagining Russia's future after Putin: The economic system by end-2027*. Chatham House.

² von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

³ Ibid.

⁴ Grauvogel, J., & von Soest, C. (2014). *Claims to legitimacy count: Why sanctions fail to instigate democratisation in authoritarian regimes*. *European Journal of Political Research*, 53(4), 635–653.

⁵ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

⁶ Council of the European Union. (2025, October 23). *19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers*.

⁷ European Commission. (n.d.). *Frequently asked questions — Sanctions against Russia*.

⁸ European Parliament. (2023, October). *Implementation and monitoring of the EU sanctions' regimes, including recommendations to reinforce the EU's capacities to implement and monitor sanctions*. Policy Department for External Relations.

⁹ European Commission. (2025, July 23). *Commission takes action to ensure complete and timely transposition of the Directive on the criminalisation of the violation of Union restrictive measures*.

transformation is much more uncertain than maximalist narratives assume. As long as the empirical record remains one of serious but incomplete degradation, transformation should be treated as a possible downstream effect rather than an already demonstrated tendency^{1,2}.

The seventh cautionary condition is uncertainty about the direction of transformation itself. Even where sanctions do contribute to internal change, the resulting transformation may not be liberal, democratic, or pro-Western. It may instead take the form of deeper authoritarian consolidation, greater militarisation of the economy, intensified centralisation, or a more closed and more repressive state structure. This caution follows directly from the literature on authoritarian resilience and from the report’s earlier analysis of institutional mutation under pressure. It also follows from the EU’s sanctions design, which is framed primarily around weakening Russia’s war capacity and constraining harmful conduct rather than around any guaranteed model of domestic political transition. Expectations should therefore be restrained wherever analysts move too quickly from “pressure” to “democratisation”. Sanctions may help transform a regime without transforming it in the hoped-for direction^{3,4,5}.

The conclusion of this subsection is therefore deliberately sober. Transformative expectations should be treated with caution when regime adaptability remains high, when costs can be shifted onto society, when sanctions reinforce authoritarian consolidation, when external intermediary channels remain open, when enforcement convergence is incomplete, when empirical impact remains mixed, and when the likely direction of change is uncertain. Under such conditions, sanctions may still be strategically valuable as instruments of degradation, containment, and long-duration pressure. What should be resisted is the temptation to read those functions too quickly as evidence of imminent political transformation. A cautious interpretation is not a pessimistic one. It is simply a more analytically responsible one^{6,7,8}.

Table 8.3.4-1. Conditions under which expectations of political transformation in Russia should be treated with caution

Cautionary condition	Why it matters	What it implies analytically
High adaptability of the regime	Re-routing, substitution, and shadow channels preserve operating space	Pressure remains real but less likely to produce quick political change
Cost transfer onto society	The regime can shield elites and strategic sectors while shifting burdens downward	Social hardship does not automatically become transformative political pressure
Authoritarian consolidation	Sanctions can be incorporated into repression and legitimisation strategies	External pressure may harden rather than liberalise the system
External support and facilitation	Third-country actors, shadow fleet, and enablers weaken closure	Transformation becomes slower, more contingent, and less direct
Incomplete enforcement convergence	Divergent implementation and delayed criminalisation reduce credibility	Broad legal scope does not automatically equal strong real pressure

¹ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

² Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

³ European Commission. (n.d.). *Sanctions adopted following Russia’s military aggression against Ukraine*.

⁴ Grauvogel, J., & von Soest, C. (2014). *Claims to legitimacy count: Why sanctions fail to instigate democratisation in authoritarian regimes*. *European Journal of Political Research*, 53(4), 635–653.

⁵ von Soest, C. (2023, September). *How Authoritarian Regimes Counter International Sanctions Pressure*. GIGA Working Paper No. 336.

⁶ European Parliament. (2025, February 11). *EU sanctions against Russia 2025: State of play, perspectives and challenges*.

⁷ Itskhoki, O., & Ribakova, E. (2024). *The Economics of Sanctions: From Theory into Practice*. *Brookings Papers on Economic Activity*, Fall, 425–497.

⁸ Giumelli, F. (2024). *A Comprehensive Approach to Sanctions Effectiveness: Lessons Learned from Sanctions on Russia*. *European Journal on Criminal Policy and Research*, 30(2), 211–228.

Cautionary condition	Why it matters	What it implies analytically
Mixed empirical impact	Serious degradation can coexist with political continuity	Transformation should be treated as possible, not demonstrated
Uncertain direction of change	Regimes under pressure may mutate without democratising	“Transformation” may mean hardening, not opening

Authorship: prepared by the author on the basis of official EU institutional materials and other works

Sources:

- European Parliament. (2025, February 11). EU sanctions against Russia 2025: State of play, perspectives and challenges.
- European Parliament. (2023, October). Implementation and monitoring of the EU sanctions’ regimes, including recommendations to reinforce the EU’s capacities to implement and monitor sanctions.
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General Conclusions

As a whole, the report leads to a clear overarching conclusion: the sanctions architecture of the European Union against the Russian Federation should be understood not as a temporary collection of punitive measures, but as a durable and increasingly sophisticated regime of European governance under conditions of prolonged geopolitical confrontation. Across Parts One to Eight, the central analytical finding has been that sanctions against Russia are not reducible to a single political act, a single package, or a single criterion of effectiveness. They operate as a cumulative system of political signalling, economic restriction, legal codification, hybrid disruption, and compliance-mediated transmission. Their real significance lies in the interaction of these dimensions rather than in the isolated effect of any one of them. The report has therefore demonstrated that the most serious error in public discussion is the continued use of a binary formula according to which sanctions either “worked” or “did not work”. That formula is too crude for the Russian case and too imprecise for a regime of this institutional density. What the evidence supports instead is a differentiated judgement: the EU sanctions regime has produced strong degradational, coordinative, legal, and compliance effects, while remaining structurally limited in its capacity for rapid direct coercion against a large adaptive authoritarian state.

A second general conclusion is that the sanctions regime has become strategically significant precisely because it has moved beyond declaratory politics and into the realm of repeatable institutional practice. Part One established that sanctions against Russia must be analysed as a structured field of policy rather than as episodic reaction, and the subsequent parts confirmed that proposition in substantive terms. Political measures framed the coalition position and fixed the boundary of non-normalisation. Economic measures materially narrowed Russia’s access to markets, finance, technologies, and logistics. Legal measures transformed political intention into a more durable normative order. Hybrid measures increasingly targeted the enabling systems through which Russia adapted. Compliance architecture converted formal law into day-to-day economic restraint. Taken together, these elements show that the EU has not merely sanctioned Russia; it has built a sanctions governance model. That institutional fact is itself one of the most important findings of the report.

The political track examined in Part Two should be judged as strategically important, though not because it forced an immediate reversal of Russian policy. Its real contribution has been to narrow Russia’s diplomatic room for manoeuvre, personalise responsibility, institutionalise non-normalisation, and stabilise coalition discipline across the EU and aligned partners. Individual restrictive measures, visa and diplomatic restrictions, and measures against information influence did not end the war. However, they did establish a durable framework in which continued aggression remained incompatible with normal political intercourse inside the European institutional space. That function should not be underestimated. In long-duration sanctions regimes, coalition coherence and normative clarity are part of effectiveness, not decorative supplements to it. Part Two showed that political sanctions work most convincingly when judged by delegitimation, signalling, and coordination rather than by narrow immediate compulsion. For that reason, the political track remains indispensable through 2030 even where its direct coercive yield remains limited.

The economic track reviewed in Part Three has produced the strongest directly observable structural pressure on Russia. The report’s analysis of financial, energy, trade-industrial, and transport restrictions showed that the EU succeeded in sharply compressing one of the most important external interfaces of the Russian economy. This compression has not amounted to total isolation, nor did it generate systemic collapse. Yet it significantly worsened the conditions under which Russia can finance, insure, ship, import, service, and technologically reproduce a war economy. This is the correct level of interpretation. Economic sanctions have mattered not because they instantly destroyed the Russian economy, but because they progressively reduced the quality, flexibility, and external optionality of its reproduction. Part Three also demonstrated that the greatest value of economic sanctions lies in

cumulative long-term effects rather than in headline short-term shock. Their strongest strategic meaning is therefore degradational, not theatrical.

The social track analysed in Part Four requires more careful interpretation. Social sanctions were shown to be the most normatively constrained and politically delicate component of the entire sanctions' architecture. Their strategic utility lies less in inflicting broad hardship than in raising the cost of social normalisation, constraining status mobility, narrowing access to selected European services and conveniences, and increasing friction for elite-society interfaces linked to the Russian system. The report correctly insisted that social sanctions must not be judged by pain alone, because such a standard would be both ethically crude and analytically unsound. Their legitimacy depends on proportionality, precision, reversibility, and the existence of protected channels for humanitarian, educational, family, and other clearly justified interactions. Part Four therefore reached an important conclusion: social sanctions can remain strategically useful, but only if they are narrowly governed and continuously monitored for over-compliance, discrimination, and collateral social distortion. In other words, social sanctions are viable only as disciplined instruments, not as diffuse symbolic hostility. Their future through 2030 lies in calibrated constraint, not indiscriminate expansion.

The legal track examined in Part Five confirmed that sanctions durability depends heavily on legal quality. This part of the report demonstrated that restrictive measures do not remain effective merely because political will exists. They remain effective when the normative architecture is sufficiently clear, updateable, defensible under review, and translatable into consistent enforcement practice. The importance of clarity, precision, judicial defensibility, controlled derogations, and periodic review was one of the strongest recurring findings of the whole document. Legal sanctions matter because they make the broader regime governable. They reduce arbitrariness, preserve legitimacy, support proportionality, and increase resistance to erosion by litigation or fragmented interpretation. The report also showed, however, that legal sophistication can become a weakness if complexity outpaces usability. The principal conclusion of Part Five is therefore twofold: the EU's legal sanctions regime has become durable and strategically valuable, but its future strength depends on continued legal craftsmanship rather than formal accumulation alone.

Part Six demonstrated that hybrid sanctions have become central to the mature phase of the Russia regime. Once Russia adapted through intermediary jurisdictions, shadow logistics, service fragmentation, proxy structures, and enabling infrastructures, a more traditional sanctions model became insufficient on its own. Hybrid measures were shown to be especially important because they target the systems that keep restricted activity feasible under adaptive conditions. Their principal strengths lie in flexibility, cross-domain reach, anti-circumvention value, and the ability to destabilise enabling networks without requiring total redesign of the whole sanctions' regime. At the same time, Part Six also showed that hybrid sanctions are management-intensive. They depend heavily on evidence quality, partner alignment, institutional agility, and the capacity to distinguish lawful activity from facilitative adaptation. Their long-term value is therefore high, but conditional. If well maintained, they are among the most promising instruments through 2030. If poorly maintained, they risk becoming operationally diffuse and administratively exhausting.

Part Seven then demonstrated that compliance is not an auxiliary technical matter but the operational transmission mechanism of the entire sanctions' regime. This is one of the report's most important general conclusions. Political intention, legal drafting, and sectoral prohibitions achieve little unless they are converted into screening, due diligence, ownership checks, payment controls, audit trails, licensing practice, and risk-based refusal. Compliance architecture is the point at which sanctions law becomes market behaviour. It is also the point at which sanctions can fragment, overburden operators, or become formalistic if guidance and enforcement convergence are weak. Part Seven showed that high-quality compliance improves deterrence and disruption, while weak compliance turns even a formally strict regime into a porous one. It follows that the future of EU sanctions policy against Russia depends not only on what is prohibited, but on who can detect, interpret, document, and block risky transactions

in practice. Compliance is therefore not merely part of the regime; it is one of its decisive conditions of reality.

When Parts Two to Seven are read together, the main result is the confirmation of cumulative architecture as the true unit of strategic assessment. Sanctions have not exerted pressure on Russia through one dominant instrument alone. They have worked by layering listings, financial restrictions, export controls, service bans, asset freezes, transport constraints, anti-circumvention tools, and compliance systems over time. The strongest effects emerged where these measures reinforced one another. Political sanctions legitimised broader escalation. Economic sanctions created material pressure. Legal measures preserved enforceability. Hybrid measures prevented adaptation from stabilising too cheaply. Compliance systems transformed formal restrictions into repeated behavioural filters. This cumulative logic also explains why adaptation does not invalidate sanctions. Adaptation is part of the same field of analysis, because it reveals where the regime remains effective, where it leaks, and where enforcement quality becomes decisive.

Part Eight then added the necessary analytical caution. The report concluded that the EU sanctions regime has been strategically consequential, but that sanctions-based coercion against Russia is subject to deep structural limits. Russia is a large adaptive authoritarian state with a resource base, a coercive apparatus, experience of redistribution under pressure, and the ability to mobilise nationalist and statist narratives against external constraint. Such a state is not easily compelled into rapid policy reversal by sanctions alone. Direct coercion is therefore the least plausible standard by which to judge the regime. This does not reduce sanctions to irrelevance. It simply places them in their proper analytical category: they are better suited to cumulative degradation, strategic narrowing, and long-term alteration of the target's operating conditions than to instant capitulation. That distinction runs through the whole report and should remain central to its final message.

The report also showed that Russia's adaptation has been real, but not neutralising. Re-routing, third-country facilitation, shadow logistics, proxy entities, and fragmented service ecosystems have all reduced the directness of pressure. Yet they have done so at higher cost, under greater opacity, with longer chains, more risk, and greater dependence on fragile substitute infrastructures. The existence of workarounds is therefore not proof that sanctions failed. It is proof that the sanctions contest matured into a struggle over the viability of adaptation itself. That is why Parts Six and Seven are so important for the overall conclusions. They demonstrate that the decisive strategic question is no longer whether Russia can adapt at all, but whether adaptation can be made progressively less efficient, less scalable, and less secure. Where the answer is yes, sanctions remain strategically meaningful even without dramatic headline outcomes. Where the answer is no, legal proliferation risks outpacing real pressure.

Another important general conclusion concerns the sender side. The report showed repeatedly that the limits of sanctions are not only Russian. They also lie within the EU and the wider coalition. Unanimity requirements, administrative unevenness, transposition gaps, over-compliance, private-sector burden, interpretative complexity, and coalition management all shape what sanctions can achieve. The EU does not deploy sanctions as an unconstrained coercive technology. It deploys them as a law-governed, politically negotiated, and administratively managed instrument. This is not a weakness that can simply be wished away. It is part of the Union's institutional identity and part of the explanation for why sanctions are at once durable and limited. The report therefore correctly resisted maximalist fantasies of frictionless escalation. Effective sanctions policy requires not only external pressure, but also internal governability. Where the latter weakens, the former becomes less credible.

The risk of diminishing returns, examined in Section 8.2.4, is therefore real and should be treated seriously. Once the easiest targets have been hit and the most visible prohibitions are already in place, additional sanctions may produce smaller marginal returns unless they specifically improve closure, enforcement, or prioritisation. This is one of the most policy-relevant conclusions of the entire study. Future effectiveness depends less on announcing ever more sanctions in the abstract and more on making the existing architecture sharper, clearer, and harder to evade. Saturation does not mean futility.

It means that strategy must become more selective and more technically disciplined. Without that adjustment, the EU risks a regime that grows textually while weakening operationally. With that adjustment, the regime can remain strategically relevant through 2030.

Part Eight also reached an important conclusion on political transformation inside Russia. Sanctions may contribute to such transformation, but only indirectly and only through mediated channels. They do not provide a realistic stand-alone mechanism of immediate regime change. Their more plausible role lies in weakening fiscal room for manoeuvre, degrading technological reproduction, altering institutional routines, narrowing strategic options, and changing elite calculations over time. This conclusion is one of the strongest safeguards against both overstatement and passivity. It means sanctions should neither be dismissed because they have not toppled the regime nor celebrated as though they automatically will. Their transformative value is conditional, delayed, and intertwined with domestic political economy. That is a more sober conclusion, but also a more useful one.

The fiscal channel is especially important in this regard. As the report showed in Part Three and again in Section 8.3, durable pressure on energy revenues, transport costs, reserves, and financial access can gradually tighten the material environment in which the Russian state allocates resources between war, repression, elite balancing, and social stabilisation. Such pressure does not operate in a politically neutral system. It affects a rent-based governing structure in which the capacity to distribute benefits and offset losses is crucial for regime maintenance. If sanctions progressively narrow that capacity, their influence may become politically significant even without immediate visible rupture. The key point is not whether sanctions create hardship in the abstract, but whether they intensify trade-offs inside the governing core. The report was right to insist on this distinction. Political transformation, if it comes, will be far more likely to emerge from altered regime management than from undirected social pain alone.

The technological and service channels may be even more important over the medium and long term. Parts Three and Six demonstrated that modern sanctions against Russia are no longer centred only on generic trade reduction. They increasingly focus on critical technologies, advanced components, machine tools, dual-use items, specialised services, infrastructure support, maritime facilitation, and the enabling systems of military-industrial reproduction. This matters because authoritarian resilience can coexist with slow deterioration in technological quality and strategic autonomy. A regime may endure politically while losing the ability to modernise efficiently, project power at the same level, or sustain militarised external confrontation at acceptable cost. Such erosion is not theatrical, but it is transformative in strategic terms. It changes what the regime can do, what it can afford, and how it must organise itself internally to compensate. By 2030, these pressures may matter more than early headline shocks.

The institutional and elite-level channels should also be emphasised. The report repeatedly showed that sanctions may contribute to a mutation of governance rather than immediate liberalisation. Prolonged external pressure can lead to tighter central allocation, more coercive administrative coordination, greater dependence on narrow external partners, deeper fusion of political and security structures, and more explicit hierarchy in state-business relations. At the same time, elite calculations may shift as external access narrows, rent competition intensifies, and long-term expectations become less secure. None of this guarantees fragmentation, and it may initially deepen authoritarian hardening. Yet it remains one of the most plausible mechanisms through which sanctions can matter politically inside Russia. The main conclusion here is therefore conditional but important: sanctions can shape political transformation, but mostly by altering internal structures and incentives rather than by triggering immediate public reversal. That is the most defensible interpretation of the available evidence.

Looking ahead to 2026–2030, the report supports a cautiously firm baseline judgement. The sanctions regime is likely to remain strategically relevant throughout this period, but only if the EU preserves its current shift from breadth to governed effectiveness. The future will not be decided by package count alone. It will be decided by whether the Union can maintain political unity, improve anti-circumvention performance, preserve legal resilience, support operator compliance, and keep adapting faster than

Russian workarounds stabilise. Some sanctions domains will remain especially durable because they constrain access to difficult-to-replace technologies, specialist services, financial infrastructures, and legitimising channels of international presence. Others will require more selective recalibration because of legitimacy thresholds, coalition burden, or diminishing marginal returns. This is exactly why the report framed 2026–2030 as a period of managed refinement rather than simple escalation. The real issue is not whether sanctions continue, but how intelligently they continue.

In the political domain, the main recommendation is to preserve the regime of non-normalisation while deepening personalisation and network mapping. Listings should continue to evolve from static naming of prominent figures towards more systematic inclusion of transit elites, para-state structures, facilitative intermediaries, and actors involved in sanctions evasion, occupation administration, war propaganda, and strategic logistics. Diplomatic restrictions should remain tied to substantive behavioural benchmarks rather than relaxed through fatigue or symbolic “reset” gestures. Information-influence restrictions should also be maintained and periodically updated, with special attention to migration into new platforms, legal entities, and dissemination channels. The principal objective should not be theatrical expansion for its sake, but sustained denial of reputational and institutional normality to the Russian state and its support structures. Political sanctions are strongest when they keep the environment of engagement conditional and visibly contingent. That function will remain important through 2030 regardless of the military calendar.

In the economic domain, the report supports continued tightening where measures directly affect Russia’s war-sustaining capacities and long-term reproduction mechanisms. Financial sanctions should move further towards closure of high-risk payment infrastructures, stricter controls on enabling non-EU banks and financial intermediaries, and better coordination around crypto-related facilitation. Energy sanctions should continue the decoupling logic developed in Part Three, especially in relation to oil transport services, LNG-linked vulnerabilities, specialised shipping support, and the broader energy-decoupling agenda. Trade-industrial and technology restrictions should remain focused on high-value choke points rather than on symbolic overbreadth. Machinery, advanced components, dual-use ecosystems, specialised software, maintenance services, certification, and engineering support are likely to remain more strategically consequential than generic volume restrictions. Transport and logistics restrictions should continue to shift from route visibility to infrastructure denial. The economic recommendation is therefore clear: pressure should deepen where it degrades reproduction, not merely where it enlarges formal prohibition.

In the legal domain, the strongest recommendation is continued investment in precision, usability, and review discipline. The report demonstrated that legal durability is one of the main conditions of long-term sanctions effectiveness. The next phase should therefore privilege clearer drafting, more stable conceptual architecture, better recital-to-rule coherence, and more structured distinction between prohibitions, derogations, and exemptions. Derogations should not be treated as weakness if they protect legitimate pathways and reduce over-compliance. They should be designed as controlled legal corridors that strengthen proportionality without opening systematic loopholes. The legal quality feedback loop proposed in Part Five should become a standing feature of sanctions governance. That includes periodic review, targeted correction of ambiguity, and stronger integration of enforcement lessons into normative revision. The EU will preserve more leverage by improving legal craftsmanship than by allowing complexity to drift.

In the hybrid and anti-circumvention domain, the report supports a much more network-oriented strategy. The period to 2030 will almost certainly remain defined by intermediary jurisdictions, shadow shipping, layered ownership structures, proxy commercial channels, and re-export chains. The EU should therefore continue moving from transaction-focused sanctions to enabling-system sanctions where the evidence supports it. That means (1) better mapping of shipping, registry, insurance, and service ecologies; (2) tighter pressure on repeat intermediary nodes; (3) more systematic use of beneficial-ownership intelligence; and (4) closer alignment with partner jurisdictions on high-risk sectors and routes. Hybrid sanctions are especially valuable because they raise the cost of adaptation

without requiring total redesign of the regime. However, they only work if they remain fast, evidence-based, and operationally supported. Through 2030, the most effective hybrid strategy will be one that behaves like a continuously managed system of adaptive constraint rather than a static body of prohibitions.

In the compliance domain, the report's recommendations are equally clear. Enforcement convergence across Member States must improve if the regime is to preserve sharpness. Screening, listing checks, beneficial-ownership verification, export and re-export due diligence, payment and insurance controls, audit trails, and internal escalation procedures must all remain central, but they must become more usable, better prioritised, and less fragmented. Public guidance should remain dynamic and more user-oriented, especially for operators outside the largest banks and multinationals. The Commission's support role should continue to expand in ways that strengthen interface clarity rather than merely adding more formal obligations. Compliance effectiveness through 2030 will depend on identifying the channels that matter most and focusing pressure there. A bureaucratically dense but strategically blunt compliance regime would be one of the main risks of the next phase. The recommendation is therefore enforcement sophistication, not procedural sprawl.

In the social domain, the report recommends caution combined with strategic discipline. Social sanctions should not become an arena for generalised punitive symbolism against Russian society. That would be both ethically weak and strategically counterproductive. Instead, the Union should preserve a model of socially visible but normatively bounded restriction: targeted mobility friction, constrained elite normalisation, carefully delimited access barriers where politically justified, and explicit protection of humanitarian, educational, family, and civil-society channels where legitimate. Governance against over-compliance and discrimination should remain a standing requirement. Social sanctions remain useful where they increase the reputational and practical cost of normality for aggression-linked actors, but they lose legitimacy where they drift into collective exclusion. The social conclusion of the report is therefore one of controlled selectivity. Through 2030, this domain should be maintained, but under stricter ethical and legal discipline than some other sanctions tracks.

A crucial conclusion concerns the relationship between sanctions and a possible future peace agreement between Russia and Ukraine. The report strongly supports the proposition that many sanctions directions should not be lifted automatically merely because a peace treaty is signed in the period 2027–2030. A peace agreement, if it occurs, would be a major political development, but it would not by itself resolve the structural issues that gave rise to the sanctions' regime. If the treaty were to coexist with unresolved accountability questions, fragile verification, unreversed military capability, preserved coercive infrastructure, ongoing occupation-related effects, or intact circumvention and war-support networks, then automatic normalisation would be strategically illogical. Parts Five to Eight make this point especially strongly. The sanctions' regime is not justified only by the existence of active battlefield operations. It is also justified by the need to manage risk, prevent rapid remilitarised regeneration, preserve leverage, and ensure that any settlement is not used as a pause for reconstruction of coercive capacity. In policy terms, the distinction between ceasefire, treaty signature, implementation, compliance, and durable settlement conditions is therefore essential.

For that reason, the report supports a principle of *conditional easing without automatic restoration*. Some sanctions' categories could in the future become subject to calibrated suspension, narrowing, or staged adjustment if clearly verifiable conditions were met. However, other categories should remain in force until there is reliable evidence of non-recurrence, verifiable compliance with settlement obligations, meaningful reduction of war-enabling capacity, and dismantling of key circumvention infrastructures. Travel and diplomatic measures may be more adjustable at the margins than dual-use controls, shadow-fleet restrictions, critical technology denial, or asset-related legal measures. Social restrictions may be narrowed earlier than network-based anti-circumvention controls if legitimacy and monitoring considerations favour that outcome. Yet none of this supports wholesale rollback. The correct principle is functional differentiation, not symbolic "peace dividend" normalisation. A mature

sanctions policy after a treaty would therefore remain conditional, benchmark-based, and strategically sequenced.

The logic for preserving many sanctions directions after a future peace treaty is especially strong in five areas. First, technology and dual-use restrictions should remain because military-industrial regeneration can occur far faster than political trust. Secondly, financial and asset-related restrictions should remain because reserve access, capital mobility, and high-risk financial channels are central to the reconstruction of coercive capability. Thirdly, anti-circumvention and hybrid measures should remain because the enabling systems built during wartime do not vanish automatically at the signing table. Fourthly, compliance architecture should remain because easing without continued due diligence would create immediate loopholes and legal confusion. Fifthly, at least part of the political and diplomatic non-normalisation framework should remain because premature restoration of normal status would weaken deterrence and reward incomplete behavioural change. The report therefore rejects any simplistic equivalence between peace signature and sanctions obsolescence. Sanctions in the 2027–2030 context should be treated as instruments of settlement enforcement as well as of wartime pressure.

A realistic 2027–2030 strategy should therefore be built around benchmarks rather than hopes. These benchmarks should include verified implementation of treaty provisions, withdrawal and non-recurrence conditions where applicable, durable compliance mechanisms, cooperation with settlement-related monitoring, reduction of sanctions-relevant military and facilitation capacities, and visible contraction of circumvention infrastructures. Easing should be reversible, staged, and linked to review intervals rather than granted as a one-off political concession. Such a model would be fully consistent with the logic developed across Parts Two to Seven and analytically reinforced in Part Eight. It would also be consistent with the report's broader understanding of sanctions as governance instruments rather than one-step punitive episodes. The main purpose would not be to preserve sanctions for symbolic reasons, but to use them rationally as part of a post-war security architecture. In that setting, continuation of many sanctions would be not excessive but prudent.

The final strategic judgement of this report is therefore balanced but firm. The EU sanctions architecture against Russia has not delivered a rapid coercive breakthrough, and no serious reading of the evidence should pretend otherwise. Yet it has generated substantial cumulative pressure, degraded capabilities, narrowed strategic options, strengthened coalition discipline, and matured into a durable field of European governance. Its greatest significance lies in the fact that it has restructured the terms under which Russia can interact with Europe and the wider sanctions coalition. It has also created a policy architecture that can remain relevant beyond the current phase of the war, including in any future settlement context. The main lesson of the report is that sanctions against Russia should be judged by strategic depth, cumulative effect, and governance quality rather than by impatience for instant political collapse. Measured against those criteria, the regime has been consequential, imperfect, but durable. Its continuation to 2030 is not only logical; under most plausible scenarios, it is strategically necessary.

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