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EU trade sanctions on Russia: auditors call for uniform implementation

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- Sanctions significantly reduced EU trade with Russia
- Enforcement remains uneven and limits the overall impact
- Circumvention remains an issue despite a broad range of measures

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EU countries differ in how they implement trade sanctions against Russia, thus reducing their overall impact, according to a new report by the European Court of Auditors (ECA). Legal ambiguities in the sanctions' framework and inconsistent enforcement by national authorities make them less effective. Member states also make uneven use of information-sharing systems, and the European Commission does not sufficiently monitor how sanctions are implemented and what they achieve. Four years after Russia launched its full-scale invasion of Ukraine, these weaknesses undercut the uniform and effective implementation of trade sanctions, and create risks of circumvention.

Trade sanctions are part of the EU's foreign and security policy. However, national customs authorities are on the front line of implementing them, so the EU relies primarily on their systems to achieve specific foreign policy objectives. Since February 2022, the EU has progressively imposed 21 sanctions packages on Russia in order to weaken its war effort by restricting trade in strategic goods. Together with measures to prevent EU goods from reaching Russia through third countries, these are the most far-reaching restrictive measures the EU has ever agreed to.

"*EU trade sanctions will deliver their intended impact if all member states apply them in a uniform and coordinated way*," said Mihails Kozlovs, the ECA Member leading the audit. "*The Commission has worked hard to establish the necessary framework and coordinate implementation, but unclear rules and weaknesses in enforcement dampen the impact of sanctions and make them easier to bypass*."

Sanctions and anti-circumvention measures have significantly reduced EU trade with Russia, and curtailed direct exports of critical military goods. Since 2022, EU-Russia trade has nosedived, although some trade continues, with the EU falling from Russia's first to its third-largest trading partner. In 2025, the EU accounted for some 10 % of Russia's trade in goods, worth €58 billion, compared with €253 billion in 2021 – a drop of more than three quarters. In July 2026, estimates put the economic impact of export restrictions and bans on goods and technology at €49 billion, equivalent to 56 % of EU exports to Russia before 2022. The impact on imports was estimated at around €110 billion, or 75 % of pre-war imports from Russia. Overall, EU sanctions have been largely effective at stopping the direct export of the goods that Russia's military needs most, including high-priority and economically critical goods. However, circumvention through third countries remains an issue, despite several anti-circumvention measures.

The auditors take a critical view of ambiguity in the EU's legal provisions, which they see as creating operational challenges for customs authorities. Customs legislation and sanctions rules sometimes use different terminology, making enforcement on the ground more difficult. Moreover, the wording of sanctions measures is sometimes vague, thus opening the door to differing interpretations by member states as regards exemptions. This creates opportunities for 'forum shopping', with businesses deliberately choosing member states where controls are less stringent, thereby paving the way for circumvention. The auditors note that a flexible approach to designing sanctions can make it easier for member states to agree to them, but the trade-off is clear: such an approach can lead to uneven implementation and increase the risk of loopholes being exploited across borders.

The Commission has established extensive mechanisms not only for coordinating trade sanctions across member states and non-EU countries, but also for providing guidance and monitoring implementation. However, this guidance is not legally binding, leaving scope for diverging national practices and potential non-compliance. Furthermore, the Commission has no criteria for assessing the overall effectiveness of sanctions. This makes it difficult to determine the extent to which they achieve their objectives and whether additional sanctions are necessary.

Background information

The EU uses restrictive measures such as trade sanctions to put pressure on Russia – and on various parties in countries that support the war, such as Belarus, Iran and North Korea – and so diminish its ability to wage war against Ukraine. The sanctions aim to impede the development of Russia's defence sector by restricting access to the equipment it needs for its military systems and denying it access to EU markets. Although member states play a key role in enforcing sanctions, the cross-policy nature of trade sanctions means there is a need for complex coordination between EU institutions and member states.

The audit assessed whether the Commission had been effective in supporting and monitoring the member states' implementation of EU trade sanctions against Russia. The auditors covered the period from February 2022 until the end of 2025, with the respective updates. They focused on sanctions on traded goods except for energy, rather than financial sanctions or those related to services or other restrictive measures such as travel bans.

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