Belarus

Specification	Restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine
Adopted by	EU
Program	BLR
Expiry date	28.02.2027
Last amendment date	23.04.2026

Notes

The EU has imposed several successive rounds of individual and sectoral sanctions, against those responsible for internal repression and human rights abuses in Belarus, and in the context of Belarus' involvement in Russia's war against Ukraine.

The Council of the EU first adopted targeted restrictive measures against specific Belarusian officials on 24 September 2004, who were reported to be key actors in the unresolved disappearances of two opposition politicians. Additional listings were introduced following the 2006 and 2011 presidential elections. However, most of the measures were suspended by the Council in 2015 and later lifted, after Belarus released all of the political prisoners and in the context of improving EU-Belarus relations.

In light of the fraudulent presidential elections that took place in August 2020 and the brutal crackdown by Belarusian security forces on the peaceful protesters, democratic opposition and journalists, the EU introduced several packages of listings, targeting both natural and legal persons. Following the unlawful forced landing of a Ryanair flight in Minsk in May 2021, the Council subsequently prohibited any aircraft operated by Belarusian air carriers to take off from, land in or overfly the territory of the Union, as well as imposed further targeted economic sanctions including various trade and financial restrictions.

In view of the situation at the EU border with Belarus and in order to respond to the instrumentalization of human beings carried out by the Belarus regime for political purposes, the Council broadened the listing criteria on 15 November 2021.

In view of the Russian unprovoked invasion of Ukraine in February 2022 and the involvement of Belarus in this aggression against Ukraine, since March 2022, the Council has adopted further sanctions. These include restrictions related to the trade of potassium chloride ('potash'), wood and cement products as well as iron and steel products . It is also prohibited to export to Belarus dual-use goods and technology, firearms and goods and technology in the aviation, space and defence industry. The Council has also imposed a ban on any Belarusian road transport operators.

Furthermore, financial measures imposed by the Council include restrictions on access to Union capital markets in relation to the Belarusian Government as well as Belarusian state-owned financial institutions and entities, a SWIFT ban for four Belarusian banks, putting limits on financial inflows from Belarus to the EU; a prohibition on providing insurance and reinsurance to the Belarusian Government and Belarusian public bodies and agencies, as well as certain prohibitions on the European Investment Bank in relation to projects in the public sector.

The close integration of the Russian and Belarusian economies has substantially facilitated the circumvention of existing sanctions. The EU therefore adopted a new set of sanctions against Belarus in June 2024, mirroring several of the measures already imposed on Russia to make EU sanctions more effective. The amendment notably extends the export ban on dual-use and advanced goods and technologies, includes further export and import restrictions, prohibition on provision on services and broadening of the road transport restrictions for Belarusian trailers or semi-trailers. The new package also introduce anti-circumvention measures, such as due diligence mechanisms and the so-called 'no re-export to Belarus clause'.

Derogations to the restrictive measures are possible as well as exemptions for humanitarian purposes.

Measures



Arms export

It is prohibited to export arms and related materiel to Belarus. Related technical or financial assistance and brokering services are also prohibited.

Asset freeze and prohibition to make funds available

All assets of the listed persons and entities should be frozen. It is also prohibited to make any funds or assets directly or indirectly available to them.

Embargo on dual-use goods

It is prohibited to sell, supply, transfer or export dual-use goods and technology to Belarus. It is also prohibited to sell, supply, transfer or export goods and technology, which might contribute to Belarus's military and technological enhancement, or to the development of its defence and security sector, as listed in Annex Va of Regulation (EC) 765/2006, to Belarus. The transit of such goods and technology via Belarus is also prohibited. Related technical or financial assistance and brokering or other services are also prohibited.

Financial measures

Transactions related to the management of reserves as well as of assets of the Central Bank of Belarus are prohibited.

Financial measures

It is prohibited to acquire new or extend existing participation in any entity operating in the energy sector or in the mining and quarrying sector in Belarus. It is also prohibited to grant new loan or credit or otherwise provide financing to, or create any joint venture with, any entity operating in the energy sector or in the mining and quarrying sector in Belarus. The provision of related investment services is also prohibited.

Financial measures

It is prohibited to engage, directly or indirectly, in any transaction with persons or entities listed in Annex XV of Regulation (EC) 765/2006 or with any person or entity established in Belarus whose proprietary rights are owned for more than 50% by an entity listed in Annex XV.

Financial measures

It is prohibited to sell, supply, transfer or export banknotes denominated in any official currency of a Member State to Belarus or to any person or entity in Belarus, including the Government and the Central Bank of Belarus, or for use in Belarus.

Financial measures

It is prohibited to sell transferable securities denominated in any official currency of a Member State issued after 12.04.2022 or units in collective investment undertakings providing exposure to such securities, to any Belarusian national or person residing in Belarus or any entity established in Belarus.

Financial measures

It is prohibited for Union central securities depositories to provide any services as defined in the Annex to Regulation (EU) 909/2014 for transferable securities issued after 12.04.2022 to any Belarusian national or person residing in Belarus or any entity established in Belarus.

Financial measures

It is prohibited to accept any deposits from Belarusian nationals or persons residing in Belarus, or entities established in Belarus, if the total value of deposits of the person or entity per credit institution exceeds 100 000 EUR.

Financial measures

It is prohibited to provide public financing or financial assistance for trade with, or investment in, Belarus.

Financial measures

It is prohibited to list and provide services as of 12.04.2022 on trading venues registered or recognised in the Union for the transferable securities of any person or entity established in Belarus and with over 50% public ownership.

Financial measures

It is prohibited to provide insurance or re-insurance to Belarus, its Government, its public bodies, corporations or agencies; or any person, entity or body acting on behalf or at the direction of such entity.



Financial measures

European Investment Bank (EIB) is prohibited from making any disbursement or payment under or in connection with any existing agreements entered between Belarus or any public authority thereof and the EIB.



Financial measures

It is prohibited to make new loans or credit with a maturity exceeding 90 days; or to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments with a maturity exceeding 90 days to Belarus, its Government, its public bodies, corporations or agencies; or a major credit or other institution established in Belarus with over 50% public ownership, as listed in Annex IX of Regulation (EC) 765/2006; or an entity established outside the EU but owned for more than 50% by an entity mentioned before; or any person or entity acting on behalf or at the direction of such entity.



Flights, airports, aircrafts

It shall be prohibited for any aircraft operated by Belarusian air carriers to take off from, land in or overfly the territory of the Union.



Road transport

It is prohibited for any road transport undertaking established in Belarus to transport goods by road within the Union, including in transit, carried out by means of trailers or semi-trailers registered in Belarus. It is also prohibited for any entity established in the Union which is owned for 25 % or more by a Belarussian person or entity to be admitted to become a road transport undertaking which transports goods by road within the territory of the Union, including in transit. As of 2.8.2024 any entity established in the Union after 8 April 2022, which is owned for 25% or more by a Belarusian person or entity, is prohibited to transport goods by road within the territory of the Union, including in transit.



Restrictions on admission

Member States shall enforce travel restrictions on persons listed in the Annex of Council Decision 2012/642/CFSP.

Restrictions on equipment used for internal repression

It is prohibited to export equipment which might be used for internal repression to Belarus. Related technical or financial assistance and services are also prohibited. Derogations subject to specific conditions exist for (a) biathlon rifles, ammunition and sights, and (b) small-calibre sporting rifles, small-calibre sporting pistols and ammunition

Restrictions on goods

It is prohibited to purchase, import or transfer goods which allow Belarus to diversify its sources of revenue, as listed in Annex XXVII of Regulation (EC) 765/2006, from Belarus. Related technical or financial and brokering or other services are also prohibited.

Restrictions on goods

It is prohibited to sell, supply, transfer, or export which could contribute in particular to the enhancement of Belarusian industrial capacities, as listed in Annex XIX Regulation (EC) 765/2006, to any natural or legal person in Belarus or for use in Belarus. The transit of such goods and technology via Belarus is also prohibited. Related technical or financial assistance and brokering or other services are also prohibited.

Aviation or the space industry

It is prohibited to sell, supply, transfer or export goods and technology suited for use in aviation or the space industry, as listed in Annex XVII of Regulation (EC) No 765/2006, to Belarus. Transit via Belarus of goods and technology, as listed in Annex XVII, exported from the Union, is also prohibited. It is also prohibited to provide any related insurance and reinsurance and certain related maintenance activities. Related technical or financial assistance and brokering or other services are also prohibited.

Cement

It is prohibited to import, purchase or transfer cement products, as listed in Annex XI of Regulation (EC) 765/2006, from Belarus. Related technical or financial assistance and brokering services are also prohibited.

Diamonds

It is prohibited, as of 1.7.2024, to purchase, import, or transfer diamonds and products incorporating diamonds, as listed in Parts A, B and C of Annex XXIX of Regulation (EC) 765/2006, from Belarus into the Union or to any third country and if they transited via the territory of Belarus. Related technical or financial assistance and brokering or other services are also prohibited.

Firearms, their parts and essential components and ammunition

It is prohibited to sell, supply, transfer or export firearms, their parts and essential components and ammunition, as listed in Annex I to Regulation (EU) No 258/2012, and firearms and other arms as listed in Annex XVI to Regulation (EC) No 765/2006, to Belarus. The transit via the territory of Belarus of such items is also prohibited. Related technical and financial assistance or brokering and other services are also prohibited.

Gold

It is prohibited to purchase, import or transfer gold, as listed in Annexes XXI and XXII of Regulation (EC) 765/2006, from Belarus. Related technical or financial assistance and brokering services are also prohibited.

Iron and steel

It is prohibited to import, purchase or transfer iron and steel products, as listed in Annex XII of Regulation (EC) 765/2006, from Belarus. Related technical or financial assistance and brokering services are also prohibited.

Luxury goods

It is prohibited to sell, supply, transfer or export luxury goods, as listed in Annex XXV of Regulation (EC) 765/2006, to any natural or legal person in Belarus or for use in Belarus. Related technical or financial assistance and brokering or other services are also prohibited.

Machinery and electrical equipment

It is prohibited to sell, supply, transfer or export machinery, as listed in Annex XIV of Regulation (EC) 765/2006, to any person or entity in Belarus or for use in Belarus. Transit via Belarus of machinery, as listed in Annex XIVa, exported from the Union, is also prohibited. Related technical or financial assistance and brokering services are also prohibited.



Maritime navigation

It is prohibited to sell, supply, transfer or export maritime navigation goods and technology, as listed in Annex XXIV Regulation (EC) 765/2006, to any natural or legal person in Belarus or for use in Belarus. Related technical or financial assistance and brokering or other services are also prohibited.



Mineral products

It is prohibited to import, purchase or transfer mineral products, as listed in Annex VII of Regulation (EC) 765/2006, from Belarus. Related technical or financial assistance and brokering services are also prohibited.



Oil refining

It is prohibited to sell, supply, transfer or export goods and technology suited for use in oil refining and liquefaction of natural gas, as listed in Annex XX of Regulation (EC) 765/2006, to any natural or legal person in Belarus or for use in Belarus, Related technical or financial assistance and brokering or other services are also prohibited.



Potassium chloride

It is prohibited to import, purchase or transfer potassium chloride (“potash”) products, as listed in Annex VIII of Regulation (EC) 765/2006, from Belarus.



Rubber

It is prohibited to import, purchase or transfer rubber products, as listed in Annex XIII of Regulation (EC) 765/2006, from Belarus. Related technical or financial assistance and brokering services are also prohibited.



Telecommunications equipment

It is prohibited to sell, supply, transfer or export equipment, technology or software intended primarily for use in the monitoring or interception by the regime of Belarus of the internet and of telephone communications on mobile or fixed networks in Belarus as listed in Annex IV of Regulation (EC) 765/2006. It is also prohibited to provide telecommunication or internal monitoring or interception services and related financial and technical assistance.



Tobacco

It is prohibited to sell, supply, transfer or export goods used for the production or manufacturing of tobacco products, as listed in Annex VI of Regulation (EC) 765/2006, in Belarus.



Wood

It is prohibited to import, purchase or transfer wood products, as listed in Annex X of Regulation (EC) 765/2006, from Belarus. Related technical or financial assistance and brokering services are also prohibited.



Restrictions on services

It is prohibited to provide accounting, auditing, bookkeeping or tax consulting services, business and management consulting or public relations services, architectural and engineering services, legal advisory services and IT consultancy services, market research and public opinion polling services, technical testing and analysis services or advertising services to any Belarusian public bodies and agencies or those acting on behalf of these. It is also prohibited to sell, supply, transfer, export, or provide software for the management of enterprises and software for industrial design and manufacture as listed in Annex XXVI of Regulation (EC) 765/2006 to any Belarusian public bodies or agencies or those acting on behalf of these. Related technical or financial assistance and brokering or other services are also prohibited. Certain exceptions apply.