

NORD STREAM AND NORD STREAM 2 TRANSACTION BAN

RELATED PROVISION: ARTICLE 5af OF COUNCIL REGULATION 833/2014

FREQUENTLY ASKED QUESTIONS – AS OF 23 JANUARY 2026

1. What is prohibited under Article 5af?

Last update: 23 January 2026

This restrictive measure is a transaction ban on infrastructure, meaning that EU operators are prohibited to engage in transactions in connection with the natural gas pipelines Nord Stream and Nord Stream 2 with regard to the completion, operation, maintenance or use of the pipelines in the Baltic Sea. In addition to this, it is also prohibited to engage in any transaction in connection with the financing concerning the completion, operation, maintenance or use of the pipelines.

As for other examples of transaction bans in Reg. 833/2014 (e.g. Art. 5aa or Art. 5ae), the prohibition is to engage directly or indirectly in any transaction with the natural gas pipelines Nord Stream and Nord Stream 2, under the stipulated conditions.

This means that EU operators are for example prohibited to provide services, goods or software contributing to the completion, operation, maintenance or use of the natural gas pipelines Nord Stream and Nord Stream 2. Since the transaction ban is also broader than already existing import and export restrictions, EU operators may only engage in transactions in connection with the completion, operation, maintenance or use of the natural gas pipelines where Article 5af(2) provides for an exception or where they have been authorised to do so in accordance with Article 5af(3).

2. Are inspection surveys concerning the pipelines covered by the transaction ban?

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As mentioned in Q.1 of this document, the transaction ban covers all services contributing to the completion, operation, maintenance or use of the natural gas pipelines.

Mere surveillance and monitoring of the pipelines' status that is not connected to restoration and preservation of their functional condition does not fall under the transaction ban. This includes for instance surveillance and monitoring of facilities, premises and hardware for security purposes. However, inspection services may fall into the scope of the transaction ban if and so far, such services (also) aim at the restoration or preservation of the functional condition of the pipeline. Due to the relevance of such measures for the operation, maintenance, use or completion of the pipelines, this would, for example, cover inspections carried out to assess the integrity of the

pipelines as part of maintenance management through detailed research activities on the infrastructure, e.g. by remotely operated vehicles (ROV) from a vessel, and analysis of the thereby generated data. In this context, it is noted that Article 5af paragraph 3 point (e) provides a derogation for regular maintenance services which are strictly necessary to prevent environmental and safety risks or a negative impact on the fisheries sector and can be authorised by the National Competent Authorities.

3. Are the entities ‘Nord Stream AG’ and ‘Nord Stream 2 AG’ sanctioned under EU law?

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The entities "Nord Stream AG" and "Nord Stream 2 AG" that operate the pipelines are not sanctioned as such. Therefore, only transactions related to the pipelines are subject to sanctions. (see Q.1).

4. Which Member State is competent to authorise maintenance work carried out by EU and non-EU operators in the exclusive economic zones of Member States?

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According to Article 13 of Regulation 833/2014, Article 5af applies within the territory of the Member States of the Union, on board any vessel under the jurisdiction of Member State, to any person who is a national of a Member State, to any legal person, entity or body which is incorporated or constituted under the law of a Member State, or to any legal person, entity or body in respect of any business done in whole or in part within the Union. All Member States exercising sovereign rights (in their exclusive economic zone or as a flag State) must comply with Regulation 833/2014. Accordingly, each Member State is competent to authorise maintenance work carried out by EU and non-EU operators in its exclusive economic zone and must do so in compliance with Regulation 833/2014.