LIQUIFIED NATURAL GAS (LNG) IMPORT BAN

RELATED PROVISION: ARTICLE 3ra OF COUNCIL REGULATION 833/2014

FREQUENTLY ASKED QUESTIONS – AS OF 24 AUGUST 2026

1. What is prohibited under Article 3ra?

Last update: 21 November 2025

Article 3ra of Council Regulation 833/2014 prohibits the purchase, import or transfer, directly or indirectly of liquified natural gas (LNG) falling under CN code 2711 11 00 originating or exported from Russia, as well as the provision of related technical or financial assistance (Art. 3ra paragraph 3).

For **existing long-term contracts** (i.e. contracts with a duration exceeding one year) that were concluded before 17 June 2025 and were not amended thereafter except for amendments of points listed in Art. 3ra paragraph 2, the prohibition enters into force on **1 January 2027**.

For all **short-term contracts** (i.e. contracts with a duration of one year or less, irrespective of the date of the conclusion of the contract) and for long-term contracts concluded on or after 17 June 2025 or amended concerning points not listed in Art. 3ra paragraph 2 thereafter, the prohibition enters already into force on 25 April 2026.[1]

The prohibitions pursuant to Article 3ra shall not apply to natural gas in gaseous state transported via pipelines.

2. Is the transfer of Russian LNG by EU operators to third country also prohibited?

Last update: 24 August 2026

Yes, except if allowed under a relevant exemption, see also Q.3. Article 3ra of Council Regulation 833/2014 prohibits the purchase, import or transfer, directly or indirectly of LNG originating or exported from Russia. According to Article 13 of Council Regulation No. 833/2014, the scope of the prohibition covers, among others, the territory of the Union; any person inside or outside the territory of the Union who is a national of a Member State; and any legal person, entity or body, inside or outside the territory of the Union, which is incorporated or constituted under the law of a Member State. It is not relevant for the purposes of this prohibition whether the goods are destined for the EU or not. Following this, the transfer of Russian LNG by Union operators irrespective of the final destination is prohibited in the context of the LNG ban of Article 3ra, unless a relevant exemption applies. This will be applicable for LNG transferred under existing long-term contracts concluded before 17 June 2025 from 1 January 2027 and for LNG transferred under all other contracts from 25 April 2026.

[1] Please note that under Regulation (EU) 2026/261 of the European Parliament and of the Council of 26 January 2026 on phasing out Russian natural gas imports and preparing the phase-out of Russian oil imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938, it is banned from **18 March 2026 to import Russian LNG under contracts which were concluded or amended after 17 June 2026.**

This supports the aim of the sanctions which is to significantly weaken Russia's economic base, depriving it of critical markets for its products and to significantly curtail its ability to wage war. Any other interpretation would render the prohibition largely devoid of purpose and create significant loopholes.

3. What is exempted from the prohibition?

Last update: 24 August 2026

A. Exemptions for specific energy projects

Amending Regulation (EU) 2026/1848 of 23 July 2026 introduced an exemption for the transport of LNG which originates in the Sakhalin-2 (Сахалин-2) Project in Russia, to Japan or to the Republic of Korea by vessel, or for technical assistance, brokering services, financing or financial assistance related to such transports. This exemption applies until 31 March 2028.

The relevant third countries, products and projects can be found in Part B of Annex XXIX of Council Regulation 833/2014.

B. Exemptions for transfer to third countries for existing long-term contracts

In addition, Amending Regulation (EU) 2026/1848 of 23 July 2026 provides for an exemption for the transfers of LNG originating or exported from Russia and, where relevant, purchases related to those transfers that are destined for third countries when both the transfer and the purchase are executed under long-term contracts (i.e. contracts with a duration exceeding one year) concluded before 24 February 2022 and not amended thereafter except for those amendments listed in Art. 3ra paragraph 6. This exemption applies until 25 July 2027 and thereafter for successive periods of one year, unless the Council, following an annual review based on a periodic assessment by the Commission, decides otherwise.

4. What information must Union operators benefitting from the exemption in Art.3ra(6) report?

Last update: 24 August 2026

Pursuant to Art. 3ra(6) of Council Regulation 833/2014, the Union operators benefitting from the exemption concerning the transfer or purchase in relation to that transfer, of LNG originating in Russia or exported from Russia, must report the following information to the relevant national competent authorities of the Member State in which they are established:

(a) cargo reference number or bill of lading number;

(b) vessel IMO number, name, flag state and carrier type;

(c) date, port and terminal of loading and unloading;

(d) final destination;

(e) volume loaded and discharged;

(f) contract durtion;

(g) contract value per cargo and gross revenue associated with each shipment;

(h) name of purchaser and ultimate beneficiary;

(i) name of seller and shipper.

The first report is due by 25 August 2026 which should cover the transfers or purchases in relation to those transfers from 24 July 2026 until 25 August 2026. Follow-up reports must be submitted every three months thereafter for the length of respective reporting period of three months.

5. **What “purchases related to that transfer” in Art.3ra(6) are covered by the exemption?**
   Last update: 24 August 2026

Purchases are only covered by the exemption in Art.3ra(6) if the transfer of the LNG purchased is carried out by an EU operator that meets the criteria of the exemption (see Q. 3 Point B).