



2025/2040

23.10.2025

COUNCIL DECISION (CFSP) 2025/2040

of 23 October 2025

amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on European Union, and in particular Article 29 thereof,

Having regard to the proposal from the High Representative of the Union for Foreign Affairs and Security Policy,

Whereas:

- (1) On 15 October 2012, the Council adopted Decision 2012/642/CFSP⁽¹⁾.
- (2) On 24 February 2022, the President of the Russian Federation announced a military operation in Ukraine and Russian armed forces began an attack on Ukraine, including from the territory of Belarus. That attack was a blatant violation of the territorial integrity, sovereignty and independence of Ukraine.
- (3) In its conclusions of 19 February 2024, the Council strongly condemned the continued support provided by the Belarusian regime to Russia's war of aggression against Ukraine and called on Belarus to refrain from such action and to abide by its international obligations.
- (4) In view of the gravity of the situation, and in response to Belarus's continued involvement in Russia's aggression against Ukraine, it is appropriate to introduce additional restrictive measures.
- (5) In particular, it is appropriate to expand the list of items which might contribute to Belarus's military and technological enhancement or to the development of its defence and security sector by adding items which have been used by Russia in its war of aggression against Ukraine and items which contribute to the development or production of Belarus's military systems, including electronic components, rangefinders, additional chemicals used in the preparation of propellants, and additional metals, oxides and alloys used in the manufacturing of military systems.
- (6) It is also appropriate to expand the list of goods subject to export restrictions which might contribute to the enhancement of Belarusian industrial capacities, such as salts and ores, articles of rubber, tubes, tyres, millstones and construction materials.
- (7) In addition, it is appropriate to impose further restrictions on the provision, to the Republic of Belarus, its Government, its public bodies, corporations or agencies or to any natural or legal person, entity or body acting on their behalf or at their direction, of software with certain uses in the banking and financial sector and services that contribute to enhancing Belarus' technological capacities, namely the provision of certain commercial space-based services, certain artificial intelligence services, and high-performance computing and quantum computing services. Moreover, it is pertinent to expand the scope of current restrictions to cover not only technical testing and analysis, as classified in class 8676 of the Central Products Classification as set out in Statistical Office of the United Nations, Statistical Papers, Series M, No 77, CPC prov., 1991, but also other services which form group 867 of the Central Products Classification. These services notably include, as classified in class 8675, the following engineering related scientific and technical consulting services: geological, geophysical and other scientific prospecting, subsurface surveying, surface surveying and map-making services.

⁽¹⁾ Council Decision 2012/642/CFSP of 15 October 2012 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine (OJ L 285, 17.10.2012, p. 1, ELI: <http://data.europa.eu/eli/dec/2012/642/oj>).

- (8) In view of Russia's continued war of aggression against Ukraine, in which Belarus is involved, any further provision of services to the Republic of Belarus, its Government, its public bodies, corporations or agencies should be assessed *ex ante* by a competent authority, in order to mitigate the risk of a service contributing to Belarus's military, technological or industrial capacity. It is therefore appropriate to introduce a requirement for prior authorisation by the competent authority for any services provided to the Republic of Belarus, its Government, its public bodies, corporations or agencies which are not already subject to the restrictive measures set out in Decision 2012/642/CFSP.
- (9) It is also appropriate to impose restrictions on the provision of crypto-asset services, on the provision of the payment services referred to in points 5 and 7 of Annex I to Directive (EU) 2015/2366 of the European Parliament and of the Council⁽²⁾, and on the issuing of electronic money to Belarusian nationals, natural persons residing in Belarus, and legal persons, entities or bodies established in Belarus, in view of the importance of those services to the development of Belarus's financial technology and e-commerce sectors and the potential use of crypto-asset services to circumvent restrictive measures. Those restrictions do not extend to the execution of payment transactions as referred to in points 3 and 4 of Annex I to Directive (EU) 2015/2366. The restrictions on the provision of payment services should not be understood as imposing obligations on payment initiation service providers to determine the nationality, residence or place of establishment of payment service users on a transaction-by-transaction basis, nor on acquirers of payment transactions to conduct sanctions screening of individual payment card transactions. Primary responsibility for sanctions compliance in relation to the execution of payment transactions rests with the account-servicing payment service provider. The restrictions on the provision of crypto-asset services are also binding on crypto-asset service providers operating under the transitional regime set out in Article 143(3) of Regulation (EU) 2023/1114 of the European Parliament and of the Council⁽³⁾.
- (10) In addition, it is also appropriate to add exemptions necessary for humanitarian purposes, for the export, sale, supply, transfer or transport of pharmaceutical, medical or agricultural and food products, to ensure access to judicial, administrative or arbitral proceedings in a Member State, and for the recognition or enforcement of a judgment or an arbitration award rendered in a Member State. Those exemptions and derogation are without prejudice to the prohibition on operators in the Union to provide financial messaging services to the entities listed in Annex V to Decision 2012/642/CFSP.
- (11) In order to further decrease Belarus's revenues it is pertinent to extend the prohibition to purchase, import or transfer certain items which allow Belarus to diversify its sources of revenue to all acyclic hydrocarbons.
- (12) Further action by the Union is needed in order to implement certain measures.
- (13) Decision 2012/642/CFSP should therefore be amended accordingly,

HAS ADOPTED THIS DECISION:

Article 1

Decision 2012/642/CFSP is amended as follows:

(1) Article 1b is amended as follows:

(a) the following paragraphs are inserted:

'3c. The prohibitions in paragraphs 1 and 3 shall not apply to the sale, supply, transfer or export of goods falling under CN codes 2501, 2505, 2507, 2513, 2516, 2517, 2528, 2606, 6804, 6815, and 6903 as listed in Annex XVIII to Regulation (EC) No 765/2006, that is necessary for the execution until 25 January 2026 of contracts concluded before 24 October 2025, or of ancillary contracts necessary for the execution of such contracts.

(2) Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC (OJ L 337, 23.12.2015, p. 35, ELI: <http://data.europa.eu/eli/dir/2015/2366/oj>).

(3) Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 (OJ L 150, 9.6.2023, p. 40, ELI: <http://data.europa.eu/eli/reg/2023/1114/oj>).

3d. The prohibitions in paragraphs 1 and 3 shall not apply to the sale, supply, transfer or export of goods falling under CN codes 6902 and 6909 19, as listed in Annex XVIII to Regulation (EC) No 765/2006, that is necessary for the execution until 25 April 2026 of contracts concluded before 24 October 2025, or of ancillary contracts necessary for the execution of such contracts.;

(b) paragraph 9 is deleted;

(2) in Article 2ea, paragraph 5 is deleted;

(3) Article 2hc is amended as follows:

(a) in paragraph 1, the introductory wording is replaced by the following:

'1. It shall be prohibited to provide, directly or indirectly, accounting services, auditing services, including statutory audit, bookkeeping, tax consulting and business and management consulting, or public relations services to:';

(b) in paragraph 2, the introductory wording is replaced by the following:

'2. It shall be prohibited to provide, directly or indirectly, construction, architectural, engineering, integrated engineering, urban planning, engineering related scientific and technical consulting and technical testing and analysis services, legal advisory services or IT consultancy services to:';

(c) in paragraph 3, the introductory wording is replaced by the following:

'3. It shall be prohibited to provide, directly or indirectly, advertising, market research or public opinion polling services to:';

(d) in paragraph 4, the introductory wording is replaced by the following:

'4. It shall be prohibited to sell, supply, transfer, export, or provide, directly or indirectly, software for the management of enterprises, software for industrial design and manufacture or software with certain uses in the banking and financial sector, to:';

(e) the following paragraph is inserted:

'4a. It shall be prohibited, as of 25 November 2025, to provide, directly or indirectly, commercial space-based services consisting of Earth observation or satellite navigation, artificial intelligence (AI) services consisting of access to models or to platforms for their training, fine-tuning and inference, or high-performance computing, including access to graphic processing unit accelerated computing, or quantum computing services to:

(a) the Republic of Belarus, its Government, its public bodies, corporations or agencies; or

(b) any natural or legal person, entity or body acting on behalf or at the direction of the Republic of Belarus, its Government, its public bodies, corporations or agencies.;

(f) paragraph 5 is replaced by the following;

'5. It shall be prohibited to:

(a) provide technical assistance, brokering services or other services related to the services and software referred to in paragraphs 1 to 4a, directly or indirectly, to the Republic of Belarus, its Government, its public bodies, corporations or agencies or to any natural or legal person, entity or body acting on behalf or at the direction of such a legal person, entity or body;

- (b) provide financing or financial assistance related to the services and software referred to in paragraphs 1 to 4a, or for the provision of related technical assistance, brokering services or other services, directly or indirectly, to the Republic of Belarus, its Government, its public bodies, corporations or agencies or to any natural or legal person, entity or body acting on behalf or at the direction of such a legal person, entity or body; or
- (c) sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to the software referred to in paragraph 4 and to the provision, manufacture, maintenance and use of that software, directly or indirectly, to the Republic of Belarus, its Government, its public bodies, corporations or agencies or to any natural or legal person, entity or body acting on behalf or at the direction of such a legal person, entity or body.;

(g) the following paragraph is inserted:

‘5a. A prior authorisation shall be required for the provision, directly or indirectly, of any service not covered by paragraphs 1, 2, 3 or 4a, to the Republic of Belarus, its Government, its public bodies, corporations or agencies. The competent authorities may authorise, based on a specific and case-by-case assessment, the provision of such services, under such conditions as they deem appropriate, after having determined that this is consistent with the objectives of this Decision.’;

(h) paragraph 10 is replaced by the following:

‘10. The prohibitions in paragraphs 2 and 4 and the prohibitions related to commercial space-based services in paragraph 4a shall not apply to the provision of services or software necessary for public health emergencies, the urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment, or as a response to natural disasters.’;

(i) the following paragraphs are inserted:

‘10a. The prohibitions in paragraph 4 shall not apply to the provision of software with certain uses in the banking and financial sector as listed in Annex XXVI to Regulation (EC) No 765/2006 that is necessary for the execution until 25 January 2026 of contracts concluded before 24 October 2025, or of ancillary contracts necessary for the execution of such contracts.

10b. Paragraph 5a shall not apply to the execution until 1 January 2026 of contracts concluded before 24 October 2025, or ancillary contracts necessary for the execution of such a contract.’;

(j) paragraph 12 is replaced by the following:

‘12. By way of derogation from the prohibitions related to software in paragraph 4 and from the prohibitions related to the provision of artificial intelligence services and high-performance computing or quantum computing services in paragraph 4a, the competent authorities may authorise the provision of software and services referred to therein, under such conditions as they deem appropriate, after having determined that the software or services are strictly necessary for the contribution of Belarusian nationals to international open-source projects.’;

(k) in paragraph 13, the introductory wording is replaced by the following:

‘13. By way of derogation from paragraphs 1 to 5, the competent authorities may authorise the services and software referred to therein, under such conditions as they deem appropriate, after having determined that this is necessary for.’;

(l) paragraph 15 is replaced by the following:

‘15. The Member State concerned shall inform the other Member States and the Commission of any authorisation granted under paragraph 5a and paragraphs 11 to 14 within 2 weeks of the authorisation.’;

(4) in Article 2ra, the following paragraph is inserted:

‘9b. With regard to the goods falling under the CN code 2901 10 00, the prohibitions in paragraphs 1 and 2 shall not apply to the execution until 25 January 2026 of contracts concluded before 24 October 2025, or of ancillary contracts necessary for the execution of such contracts.

9c. As of 26 January 2026 until 25 July 2026, the prohibitions in paragraphs 1 and 2 shall not apply to the purchase or import to Hungary of goods falling under CN code 2901 10 00 originating in Belarus or exported from Belarus, provided that the goods are intended for exclusive use in Hungary.

9d. Goods falling under CN code 2901 10 00 imported to Hungary following the exemption in paragraph 9c shall not be sold on to buyers located in another Member State or in a third country.’;

(5) in Article 2s the following paragraph is inserted:

‘3ab. By way of derogation from paragraph 1a, the competent authorities may authorise the transit via the territory of Belarus of goods and technology listed in Annex XIVa to Regulation (EC) No 765/2006, after having determined that such goods or technology are necessary for:

(a) medical or pharmaceutical purposes, or for humanitarian purposes, such as delivering or facilitating the delivery of assistance, including medical supplies, food, or the transfer of humanitarian workers and related assistance or for evacuations;

(b) the exclusive use and under the full control of the authorising Member State and in order to fulfil its maintenance obligations in areas which are under a long-term lease agreement between that Member State and Belarus; or

(c) the establishment, operation, maintenance, fuel supply and retreatment and safety of civil nuclear capabilities, and the continuation of design, construction and commissioning required for the completion of civil nuclear facilities, the supply of precursor material for the production of medical radioisotopes and similar medical applications, or critical technology for environmental radiation monitoring, as well as for civil nuclear cooperation, in particular in the field of research and development.’;

(6) Article 2u is amended as follows:

(a) paragraph 1a is replaced by the following:

‘1a. It shall be prohibited to provide, directly or indirectly, the following services to Belarusian nationals or natural persons residing in Belarus, or to legal persons, entities or bodies established in Belarus:

(a) crypto-asset services, as defined in Regulation (EU) 2023/1114 of the European Parliament and of the Council (*);

(b) issuing of payment instruments, acquiring of payment transactions, or payment initiation services, as defined in Directive (EU) 2015/2366 of the European Parliament and of the Council (**);

- (c) issuing of electronic money, as defined in Directive 2009/110/EC of the European Parliament and of the Council (***)).

(*) Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 (OJ L 150, 9.6.2023, p. 40, ELI: <http://data.europa.eu/eli/reg/2023/1114/oj>).

(**) Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC (OJ L 337, 23.12.2015, p. 35, ELI: <http://data.europa.eu/eli/dir/2015/2366/oj>).

(***) Directive 2009/110/EC of the European Parliament and of the Council of 16 September 2009 on the taking up, pursuit and prudential supervision of the business of electronic money institutions amending Directives 2005/60/EC and 2006/48/EC and repealing Directive 2000/46/EC (OJ L 267, 10.10.2009, p. 7, ELI: <http://data.europa.eu/eli/dir/2009/110/oj>).;

- (b) paragraph 1b is replaced by the following:

'1b. It shall be prohibited, as from 26 March 2025, to allow Belarusian nationals or natural persons residing in Belarus to directly or indirectly own or control, or to hold any posts in the governing bodies of, a legal person, entity or body which is incorporated or constituted under the law of a Member State and is providing crypto-asset wallet, account or custody services.;

- (c) paragraph 4 is replaced by the following:

'4. By way of derogation from paragraphs (1) and (1a), the competent authorities may authorise the acceptance of such a deposit or the provision of such a service, under such conditions as they deem appropriate, after having determined that the acceptance of such a deposit or the provision of such a service is:

- (a) necessary to satisfy the basic needs of natural or legal persons, entities or bodies referred to in paragraph 1 and their dependent family members, including payments for food, rent or mortgage, medicines and medical treatment, taxes, insurance premiums, and public utility charges;
- (b) intended exclusively for the payment of reasonable professional fees or the reimbursement of incurred expenses associated with the provision of legal services;
- (c) necessary for extraordinary expenses, provided that the relevant competent authority has notified the competent authorities of the other Member States and the Commission of the grounds on which it considers that a specific authorisation should be granted, at least two weeks prior to the authorisation;
- (d) necessary for official purposes of a diplomatic mission or consular post or international organisation;
- (e) intended exclusively for the payment of fees or service charges for the routine holding or maintenance of frozen funds or economic resources; or
- (f) necessary for non-prohibited cross-border trade in goods and services between the Union and Belarus.;

- (d) the following paragraphs are inserted:

'4a. The prohibition in paragraph 1a, points (b) and (c), shall not apply to the provision of personalised security credentials necessary to access an account with a credit institution or an electronic money institution established in a Member State or a country as listed in Annex IVa.

4b. By way of derogation from paragraph 1a, points (b) and (c), the competent authorities may authorise the provision of such a service, under such conditions as they deem appropriate, after having determined that to do so is necessary for the exclusive use of legal persons, entities or bodies established in Belarus that are owned by, or solely or jointly controlled by, a legal person, entity or body which is incorporated or constituted under the law of a Member State or a country as listed in Annex IVa.

4c. The Member State concerned shall inform the other Member States and the Commission of any authorisation granted under paragraph 4, point (a), (b), (d), (e) or (f), and paragraph 4b within two weeks of the authorisation.;

(e) in paragraph 5, the introductory wording is replaced by the following:

'5. By way of derogation from Article 2u(1) and (1a), the competent authorities may authorise the acceptance of such a deposit or provision of such a service, under such conditions as they deem appropriate, after having determined that the acceptance of such a deposit or provision of such a service is necessary for:';

(7) in Article 2y, the following points are added to paragraph 1a:

'(c) necessary for the export, sale, supply, transfer or transport of pharmaceutical, medical or agricultural and food products, including wheat and fertilisers, the export, sale, supply, transfer or transport of which to Belarus is allowed under this Decision;

(d) strictly necessary to ensure access to judicial, administrative or arbitral proceedings in a Member State, as well as for the recognition or enforcement of a judgment or an arbitration award rendered in a Member State, provided that such transactions are consistent with the objectives of this Decision; or

(e) necessary for humanitarian purposes, such as delivering or facilitating the delivery of assistance, including medical supplies, food, or the transfer of humanitarian workers and related assistance or for evacuations.'

Article 2

This Decision shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.

Done at Brussels, 23 October 2025.

For the Council

The President

M. BJERRE