

LIQUIFIED NATURAL GAS (LNG) IMPORT BAN
RELATED PROVISION: ARTICLE 3ra OF COUNCIL REGULATION 833/2014
FREQUENTLY ASKED QUESTIONS – AS OF 21 NOVEMBER 2025

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.

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?

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Yes. 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. 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.

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.