

## SANCTIONS: WEEK OVERVIEW

### EU

#### The General Court did not lift sanctions against Andrey and Alexandra Melnichenko

On 22.01.2025 and 26.02.2025, the General Court of the EU dismissed the claims of Melnichenko spouses, confirming the legality of sanctions for the period from March 2022 to April 2023 (see digests of [03.02.2025](#) and [05.03.2025](#)). On 17.12.2025, the ECJ dismissed the claims regarding sanctions for the period from September 2023 to September 2025.

In its decision on the husband, the court [stated](#) that the March 2022 relinquishment of beneficiary status in favor of the wife (rather than to an independent third party) did not constitute a sufficient change in circumstances. Bermuda law opinions concern ownership only. Media report an increase in his wealth after the sanctions, showing he continued to benefit from an autonomously operating business.

In its decision on the wife, the court [noted](#) that although the general purpose of the rule on sanctions against relatives in criteria (g) is to prevent circumvention of sanctions, the EU Council is not required to prove circumvention in each case. A family relationship and any received benefit suffice.

In both proceedings, EuroChem and SUEK participated as third parties, supporting the applicants' claims. The violation of the companies' rights consisted in the fact that references to them in the sanctions reasoning gave rise to the assumption that the companies were subject to sanctions too. The court pointed out that those references do not relieve the EU Member States sanctions regulators of their duty to establish their status independently.

#### The General Court did not lift sanctions against Igor Rotenberg

On 19.06.2024, the court dismissed the businessman's claim, confirming the legality of the sanctions imposed on 14.09.2022 (see digest of [01.07.2024](#)). On 17.12.2025, the court [dismissed](#) the claim regarding sanctions for the period from March 2024 to September 2025.

The sanctions were imposed based on criteria (a) and (d), and the issue under consideration was whether the claimant had benefited from the Russian Government during the period under dispute. The ECJ noted that the EU Council is entitled to consider facts from the period preceding the contested period if those facts establish continuity between the past and present situation of the sanctioned person. Proceeds from company sales, including profits from state contracts, partly received during the contested period, formed part of the applicant's assets. In addition, part of the price was already paid

during the contested period. Therefore, the applicant continued to benefit from the Russian Government during the contested period.

### CANADA

#### Federal Court of Appeal dismissed Igor Makarov's appeal

On 19.04.2022, the businessman was added to the sanction list. In June 2023, he was removed from the sanctions list after renouncing his Russian citizenship but was subsequently re-designated following amendments allowing sanctions against non-Russians. On 07.08.2024, the court of first instance rejected the businessman's appeal against the Minister's refusal to remove him from the sanctions list a second time (see digest of [19.08.2024](#)).

On 09.12.2025, the Court of Appeal dismissed the appeal against the decision of the court of first instance, finding that the Global Affairs Department had reasonable grounds to believe that the applicant had remained connected to Russia. He renounced Russian citizenship, condemned the military actions, and provided humanitarian contribution to Ukrainians. However, Mr Makarov did not condemn the Russian authorities, and the Department was unable to verify his humanitarian aid.

For context: on 05.03.2024, the businessman was excluded from UK sanctions (see digest of [18.03.2024](#)).

### CHANGES TO SANCTIONS LISTS

Following the entry into force of EU Regulation 2025/2600 on indefinite freezing of assets of the Bank of Russia and the National Welfare Fund, on 15.12.2025, sanctions were [imposed](#) on a few Russian experts on international relations under EU Regulation 2024/2642.

On the same day, EU sanctions were [imposed](#) on managers of 2Rivers and Litasco, companies which were included in the 18th and 19th packages, respectively, as well as on international oil trader M. Lakhani. That also includes four companies from Azerbaijan, the UAE, and Vietnam that own and/or operate tankers. The next step on 18.12.2025, [was sanctions](#) against 41 tankers.

At the same time, on 18.12.2025, the UK followed the EU in [imposing](#) sanctions against M. Lakhani and his company. In addition, the UK blocked Tatneft, Russneft, Rusneftegaz, NNK-Oil, and others.

On the same day, OFAC [removed](#) D. Bugayenko and two related Cypriot companies from the US sanctions list. Sanctions against them had previously been imposed for their operations in the Russian financial sector, with HNWI funds. Finally, several non-Russian companies previously referred to as violators of export control were removed from the list.