



Brussels, 9 December 2025
(OR. en)

15726/25

LIMITE

CORLX 1107
CFSP/PESC 1687
RELEX 1527
COEST 832
FIN 1418

LEGISLATIVE ACTS AND OTHER INSTRUMENTS

Subject: COUNCIL IMPLEMENTING REGULATION implementing Regulation (EU) 2024/2642 concerning restrictive measures in view of Russia's destabilising activities

COUNCIL IMPLEMENTING REGULATION (EU) 2025/...

of ...

**implementing Regulation (EU) 2024/2642
concerning restrictive measures in view of Russia's destabilising activities**

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EU) 2024/2642 of 8 October 2024 concerning restrictive measures in view of Russia's destabilising activities¹, and in particular Article 13(1) thereof,

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

¹ OJ L, 2024/2642, 9.10.2024, ELI: <http://data.europa.eu/eli/reg/2024/2642/oj>.

Whereas:

- (1) On 8 October 2024, the Council adopted Regulation (EU) 2024/2642.
- (2) On 18 July 2025, the High Representative of the Union for Foreign Affairs and Security Policy ('the High Representative') published a statement on behalf of the Union, in which she strongly condemned the persistent malicious activities posed by Russia, which form part of broader, coordinated and long-standing hybrid campaigns aimed at threatening and undermining the security, resilience and democratic foundations of the Union, its Member States and its partners. The High Representative stressed that Russia's malicious activities had escalated further since the beginning of the war of aggression against Ukraine and were highly likely to persist in the foreseeable future.
- (3) The Union remains unwavering in its condemnation of Russia's malicious activities directed against the Union, its Member States, international organisations and third countries.
- (4) In view of the gravity of the situation, the Council considers that 12 natural persons and two entities should be added to the list of natural and legal persons, entities and bodies set out in Annex I to Regulation (EU) 2024/2642.
- (5) Regulation (EU) 2024/2642 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

Article 1

Annex I to Regulation (EU) 2024/2642 is amended in accordance with the Annex to this Regulation.

Article 2

This Regulation shall enter into force on the date of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at ..., ...

For the Council

The President

ANNEX

Annex I to Regulation (EU) 2024/2642 is amended as follows:

(1) the following entries are added under the heading ‘A. Natural persons’:

	Name	Identifying information	Statement of Reasons	Date of listing
‘48.	John Mark DOUGAN	Function: former Florida deputy sheriff DOB: 15.12.1976 POB: Wilmington, Delaware, United States of America Nationality: American, Russian Gender: male	John Dougan is a former Florida deputy sheriff who fled to Russia in 2016. He is publicly accused of participating in pro-Kremlin digital information operations from Moscow by operating the CopyCop network of fake news websites and supporting Storm-1516 activities. The inauthentic websites mimic legitimate media outlets and spread fabricated stories and AI-generated deepfake content. Reports from Western authorities and independent investigative sources link Dougan’s activities to Russia’s military intelligence agency (GRU) and the Moscow-based think tank the Center for Geopolitical Expertise, suggesting he receives Russian support and direction to influence elections, discredit political figures and manipulate public discourse in Western countries.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Name	Identifying information	Statement of Reasons	Date of listing
			<p>Therefore, John Dougan is responsible for, implementing, supporting or benefitting from actions or policies attributable to the Government of the Russian Federation which undermine or threaten democracy, the rule of law, stability or security in the Union and in third countries by planning, directing, engaging in, directly or indirectly, supporting or otherwise facilitating the use of information manipulation and interference.</p>	

	Name	Identifying information	Statement of Reasons	Date of listing
49.	Andrey Andreievich SUSHENTSOV (Russian: Андрей Андреевич СУШЕНЦОВ)	Function: Director of the Institute for International Studies (IIS), Moscow State Institute of International Relations (MGIMO University) – a diplomatic academy under the Ministry of Foreign Affairs of the Russian Federation; Programme Director of the Valdai Discussion Club; member of the Council on Foreign and Defence Policy (SVOP); frequent commentator for Russian state media and author for Russia in Global Affairs and other Kremlin-aligned outlets DOB: 8.6.1983 POB: Orenburg, USSR (now Russian Federation)	Andrey Sushentsov is one of the Russia’s key foreign-policy ideologues operating within the state-academic and think-tank system. His institute (IIS MGIMO) is directly subordinated to the Russian Ministry of Foreign Affairs and closely integrated with official diplomatic and strategic planning structures. Sushentsov regularly appears in Russian and international media, presenting Russia’s foreign-policy worldview in line with Kremlin messaging. His commentary consistently promotes the following narratives: the West provoked the conflict in Ukraine by expanding NATO and threatening Russia’s security; Russia’s actions are defensive and aimed at restoring “strategic balance” in the international system; the “unipolar world order” led by the US is collapsing, and Russia, together with China and the “Global South”, is constructing a fairer multipolar world; and Western sanctions are illegitimate and self-destructive, used as tools of coercion against sovereign states. He frequently represents the Russian perspective at Valdai panels attended by President Vladimir Putin and senior officials, serving as both an organiser and a spokesperson for Kremlin-approved messaging.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
		Nationality: Russian Gender: male INN: 400407010797	Therefore, Andrey Sushentsov is responsible for or supporting actions or policies attributable to the Government of the Russian Federation which undermine or threaten democracy, the rule of law, stability or security in the Union or in several of its Member States, in an international organisation or in a third country, or which undermine or threaten the sovereignty or independence of a third country (Ukraine) by supporting or otherwise facilitating the use of information manipulation and interference.	

	Name	Identifying information	Statement of Reasons	Date of listing
50.	Dmitry Vyacheslavovich SUSLOV (Russian: Дмитрий Вячеславович СУСЛОВ)	Function: Deputy Director, Centre for Comprehensive European and International Studies (CCEIS), Higher School of Economics (HSE University), Moscow; Deputy Director for Research Programmes at the Council on Foreign and Defence Policy (SVOP); expert and frequent speaker at the Valdai Discussion Club; contributor to Russia in Global Affairs and other Kremlin-aligned publications DOB: 15.2.1979 POB: Leningrad, USSR (now Saint Petersburg, Russian Federation) Nationality: Russian Gender: male	Dmitry Suslov is a Russian foreign-policy analyst embedded in institutions closely linked to the Kremlin’s policy and messaging apparatus. Through his roles at HSE University, the Council on Foreign and Defence Policy, and the Valdai Discussion Club, he regularly participates in high-level discussions shaping and disseminating Russia’s foreign-policy narratives. He frequently appears as an “independent expert” in Russian state and international media, where he advances positions consistent with official Kremlin lines: portraying NATO and the United States as responsible for provoking the war in Ukraine, framing Western military support to Kyiv as “escalation” or “direct involvement” in the conflict and justifying Russian coercive actions as defensive or inevitable responses to Western aggression. In 2024, Suslov publicly suggested that Russia should consider a “demonstrative nuclear explosion” to “remind the West of the dangers of nuclear war,” a statement widely reported by Reuters and other outlets. Such remarks normalise the idea of nuclear signalling and coercion, directly contributing to the climate of intimidation surrounding Russia’s war policy.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			<p>Therefore, Dmitry Suslov is responsible for or supporting actions or policies attributable to the Government of the Russian Federation which undermine or threaten democracy, the rule of law, stability or security in the Union or in several of its Member States, in an international organisation or in a third country, or which undermine or threaten the sovereignty or independence of a third country (Ukraine) by supporting or otherwise facilitating the use of information manipulation and interference or by instigating or otherwise facilitating a violent conflict in a third country.</p>	

	Name	Identifying information	Statement of Reasons	Date of listing
51.	Fyodor Aleksandrovich LUKYANOV (Russian: Фёдор Александрович ЛУКЪЯНОВ)	Function: journalist, TV presenter and political scientist; Editor-in-Chief of Russia in Global Affairs; Research Director of the Valdai Discussion Club; member of the Russian International Affairs Council (RIAC) DOB: 1.2.1967 POB: Moscow, USSR (now Russian Federation) Nationality: Russian Gender: male	Fyodor Lukyanov is a prominent Russian political analyst, foreign-policy commentator, and academic closely tied to Kremlin-affiliated think tanks. He is the Editor-in-Chief of Russia in Global Affairs, one of Russia’s most influential foreign-policy journals, and serves as Research Director of the Valdai Discussion Club, a platform strongly linked to the Russian leadership and frequently used to promote official narratives. He is also a member of the Russian International Affairs Council (RIAC) and often moderates sessions with President Vladimir Putin at Valdai forums. Through his writing, interviews and public appearances, Lukyanov consistently amplifies Kremlin propaganda, portraying Russia’s war of aggression against Ukraine as a defensive reaction to Western policies. He repeatedly blames the Union, NATO and the United States for “provoking” the conflict, describes Ukraine as a Western proxy rather than a sovereign state, and justifies Russian military actions as “necessary” to stop NATO expansion. His arguments are frequently cited in pro-Kremlin media and shape the intellectual framework used to legitimise Russia’s aggression.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			<p>He is a key opinion leader providing ideological cover for Russian aggression. His work at Valdai and Russia in Global Affairs directly supports Kremlin foreign-policy narratives abroad. He contributes to systematic disinformation campaigns that shift blame for the war onto Ukraine and the West.</p> <p>Therefore, Fyodor Lukyanov is responsible for or supporting actions or policies attributable to the Government of the Russian Federation which undermine or threaten democracy, the rule of law, stability or security in a third country or which undermine or threaten the sovereignty or independence of a third country (Ukraine) by supporting or otherwise facilitating the use of information manipulation and interference or by instigating a violent conflict in a third country.</p>	

	Name	Identifying information	Statement of Reasons	Date of listing
52.	Ivan Nikolaevich TIMOFEEV	<p>Function: political scientist, foreign-policy analyst and policy strategist; Director General of the Russian International Affairs Council (RIAC); Programme Director of the Valdai Discussion Club</p> <p>DOB: 1983</p> <p>POB: USSR (now Russian Federation)</p> <p>Nationality: Russian</p> <p>Gender: male</p>	<p>Ivan Timofeev is a prominent Russian political scientist and foreign-policy analyst closely associated with Kremlin-aligned institutions. He serves as the Director General of the Russian International Affairs Council (RIAC) – an organisation established by the Russian Foreign Ministry – and as a Programme Director of the Valdai Discussion Club, a high-profile platform used by the Russian leadership, including President Vladimir Putin, to promote official state narratives to domestic and international audiences. Timofeev is also a frequent contributor to Russia in Global Affairs and a commentator for state media such as TASS and Izvestia.</p>	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			<p>Through his writing, interviews and appearances at Valdai forums, Timofeev consistently amplifies Kremlin propaganda. He portrays Russia's invasion of Ukraine as a defensive response to Western provocation, describes Ukraine as a Western "proxy," and blames the United States and NATO for escalating the conflict. His analyses routinely legitimise Russian military aggression and normalise confrontation with the West, while discrediting Western sanctions and portraying them as acts of hostility.</p> <p>Therefore, Ivan Timofeev is responsible for or supporting actions or policies attributable to the Government of the Russian Federation which undermine or threaten democracy, the rule of law, stability or security in a third country (Ukraine), or which undermine or threaten the sovereignty or independence of a third country (Ukraine) by supporting or otherwise facilitating the use of information manipulation and interference.</p>	

	Name	Identifying information	Statement of Reasons	Date of listing
53.	<p>Andrey Georgievich BYSTRITSKYI (Russian: Андрей Георгиевич БЫСТРИЦКИЙ)</p>	<p>Function: journalist, media manager, academic and think-tank executive; Chairman of the Board of the Valdai Discussion Club Foundation DOB: 21.7.1960 POB: Moscow, USSR (now Russian Federation) Nationality: Russian Gender: male</p>	<p>Andrei Bystritskyi's leadership in Valdai and his media/academic background suggest he actively supports and disseminates the official Russian narrative regarding international relations, media control and Russia's role in global affairs. The Valdai Club is used as a tool of Russian public diplomacy and soft power; by managing this body, Bystritskyi contributes to the infrastructure of state narrative production and dissemination. As dean of a major university faculty (communications/media) and a seasoned media-manager, he is in a position to shape curricula, research and public discourse around media, communications and state narratives – which can facilitate coordinated information or interference campaigns. His quotes and speeches reflect and promote Russian diplomatic narratives – such as those about a multipolar world or the Global South cooperating with Russia, which align with Kremlin strategic messaging.</p> <p>Therefore, Andrei Bystritskyi is responsible for or supporting actions or policies attributable to the Government of the Russian Federation which undermine or threaten democracy, the rule of law, stability or security in the Union or in several of its Member States or in a third country (Ukraine) by supporting or otherwise facilitating the use of information manipulation and interference.</p>	+

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	Name	Identifying information	Statement of Reasons	Date of listing
54.	Vladislav Yevgenevich BOROVKOV (Russian: Владислав Евгеньевич БОРОВКОВ)	Function: officer (Senior Lieutenant) of GRU Unit 29155 DOB: 7.10.1997 POB: Russian Federation Nationality: Russian Gender: male	Vladislav Borovkov is a member of GRU (Russia's military intelligence agency), Unit 29155, as well as of cyber actor Cadet Blizzard. Borovkov acted in concert with other Cadet Blizzard members. Furthermore, between December 2020 and August 2024, Borovkov took part in cyber attacks against government organisations in Ukraine. Cadet Blizzard employed WhisperGate wiper malware on the compromised systems, causing significant damage to Ukraine's systems. Furthermore the group also targeted Member States of the Union and members of NATO with the aim of gaining sensitive information and destabilising their political situation. Therefore, Vladislav Borovkov is responsible for or implementing actions or policies attributable to the Government of the Russian Federation which undermine or threaten stability or security in, or the sovereignty of, the Union, several of its Member States, NATO and Ukraine by engaging in actions targeted at the functioning of services of public interest or aimed at damaging or destroying their critical infrastructure through malicious cyber activities. He is also a person associated with the entity GRU Unit 29155.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
55.	Denis Igorevich DENISENKO (Russian: Денис Игоревич ДЕНИСЕНКО)	Function: officer of GRU Unit 29155 DOB: 14.5.1997 POB: Russian Federation Nationality: Russian Gender: male	<p>Denis Denisenko is a member of GRU (Russia's military intelligence agency), Unit 29155, as well as of cyber actor Cadet Blizzard. Denisenko acted in concert with other Cadet Blizzard members. Furthermore, between December 2020 and August 2024, Denisenko took part in cyber attacks against government organisations in Ukraine. Cadet Blizzard employed WhisperGate wiper malware on the compromised systems, causing significant damage to Ukraine's systems. Furthermore the group also targeted Member States of the Union and members of NATO with the aim of gaining sensitive information and destabilising their political situation.</p> <p>Therefore, Denis Denisenko is responsible for or implementing actions or policies attributable to the Government of the Russian Federation which undermine or threaten stability or security in, or the sovereignty of, the Union, several of its Member States, NATO and a third country (Ukraine) by engaging in actions targeted at the functioning of services of public interest or aimed at damaging or destroying their critical infrastructure through malicious cyber activities. He is also a person associated with the entity GRU Unit 29155.</p>	+

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	Name	Identifying information	Statement of Reasons	Date of listing
56.	Dmitry Iurevich GOLOSHUBOV (Russian: Дмитрий Юрьевич ГОЛОШУБОВ)	Function: officer of GRU Unit 29155 DOB: 10.10.1998 POB: Russian Federation Nationality: Russian Gender: male	<p>Dmitry Goloshubov is a member of GRU (Russia's military intelligence agency), Unit 29155, as well as of cyber actor Cadet Blizzard. Goloshubov acted in concert with other Cadet Blizzard members. Furthermore, between December 2020 and August 2024, Goloshubov took part in cyber attacks against government organisations in Ukraine. Cadet Blizzard employed WhisperGate wiper malware on the compromised systems, causing significant damage to Ukraine's systems. Furthermore the group also targeted Member States of the Union and members of NATO with the aim of gaining sensitive information and destabilising their political situation.</p> <p>Therefore, Dmitry Goloshubov is responsible for or implementing actions or policies attributable to the Government of the Russian Federation which undermine or threaten stability or security in, or the sovereignty of, the Union, several of its Member States, NATO and a third country (Ukraine) by engaging in actions targeted at the functioning of services of public interest or aimed at damaging or destroying their critical infrastructure through malicious cyber activities. He is also a person associated with the entity GRU Unit 29155.</p>	+

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	Name	Identifying information	Statement of Reasons	Date of listing
57.	Jacques BAUD	<p>Function: former colonel in the Swiss army; former strategic analyst, intelligence and terrorism specialist</p> <p>DOB: 1.4.1955</p> <p>Nationality: Swiss</p> <p>Gender: male</p>	<p>Jacques Baud, a former Swiss army colonel and strategic analyst, is a regular guest on pro-Russian television and radio programmes. He acts as a mouthpiece for pro-Russian propaganda and makes conspiracy theories, for example accusing Ukraine of orchestrating its own invasion in order to join NATO.</p> <p>Therefore, Jacques Baud is responsible for, implementing or supporting actions or policies attributable to the Government of the Russian Federation which undermine or threaten stability or security in a third country (Ukraine) by engaging in the use of information manipulation and interference.</p>	+

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	Name	Identifying information	Statement of Reasons	Date of listing
58.	Xavier MOREAU	<p>Function: former military officer and Franco-Russian businessman; founder of the Stratpol website</p> <p>DOB: 25.10.1971</p> <p>Nationality: French</p> <p>Gender: male</p>	<p>Xavier Moreau is a businessman and founder of the Stratpol website, and a former military officer. He acts as a mouthpiece for pro-Russian and pro-Kremlin propaganda, spreading conspiracy theories about Russia's invasion of Ukraine, for example accusing Ukraine of orchestrating its own invasion in order to join NATO.</p> <p>Therefore, Xavier Moreau is responsible for, implementing or supporting actions or policies attributable to the Government of the Russian Federation which undermine or threaten stability or security in a third country (Ukraine) by engaging in the use of information manipulation and interference.</p>	+

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	Name	Identifying information	Statement of Reasons	Date of listing
59.	Diana Vitaliivna PANCHENKO (Ukrainian: Діана Віталіївна ПАНЧЕНКО) (Russian: Диана Витальевна ПАНЧЕНКО)	DOB: 21.5.1988 POB: Mykolaïv, Ukrainian SSR (now Ukraine) Nationality: Ukrainian, Russian Gender: female	Diana Panchenko is a Ukrainian-born journalist and propagandist. She produces and diffuses anti-Ukrainian, pro-Russian, anti-NATO narratives. In her videos, she deliberately mimics news-broadcast formats, in order to legitimise the Kremlin’s narratives. She manipulates information to portray Ukrainian authorities as “Nazis” and accuses them of betraying their own people, while justifying Russia’s military aggression and crimes. She has produced work in occupied Ukrainian regions (including in Mariupol and Donetsk) which has been described as propaganda justifying war crimes by the Ukrainian Security Service (SBU). Her content was broadcasted on Ukrainian televisions during a Russian cyber attack that disrupted television programming.	+;

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	Name	Identifying information	Statement of Reasons	Date of listing
			<p>Panchenko also amplifies conspiratorial and anti-Ukrainian rhetoric on her Telegram channel (402k subscribers) and on X (148k followers). On her X account, she tries to increase her English-speaking audience by using clickbait content and inauthentic activity and by promoting pro-Russian accounts.</p> <p>Therefore, Diana Panchenko is responsible for, implementing or supporting actions or policies attributable to the Government of the Russian Federation which undermine or threaten stability or security in a third country (Ukraine) by engaging in the use of information manipulation and interference.</p>	

(2) the following entries are added under the heading ‘B. Legal persons, entities and bodies’:

	Name	Identifying information	Statement of Reasons	Date of listing
‘16.	142nd Separate Electronic Warfare Battalion 142-й батальон радиоэлектронной борьбы 142-й батальон РЭБ 142-й отдельный батальон радиоэлектронной борьбы	236000, Posyolok Kumachevo, Kaliningrad region, Russian Federation	<p>The 142nd Separate Electronic Warfare Battalion, based in Kaliningrad region, is part of electronic warfare and plays an important role in ensuring the security and defence of the region. The battalion is responsible for using technology to disorganise any system of shortwave communication, conducting electronic warfare exercises to disrupt enemy navigation and radio communications as well as for the collection and analysis of intelligence information obtained by observing electromagnetic radiation in the short and ultrashort wave ranges.</p> <p>Recently, several European countries have experienced GPS signal failures, which have been attributed to electronic warfare activities by Russia, specifically from Kaliningrad. This includes deliberate jamming and “spoofing” of GPS signals, primarily affecting the Baltic States. Interference and manipulation of GPS signals has led to obstacles for landing civil planes.</p>	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			<p>The 142nd Separate Electronic Warfare Battalion in Kaliningrad has received jamming equipment and conducted exercises using advanced systems capable of disrupting communications over large areas.</p> <p>Therefore, the 142nd Separate Electronic Warfare Battalion, as part of Russia's military forces enabling the (mis)use of the radio frequency sector, is responsible for actions or policies attributable to the Government of the Russian Federation which undermine or threaten stability or security in, or the sovereignty of, the Member States of the Union by engaging in, directly or indirectly, supporting or otherwise facilitating the use of information manipulation and interference or actions aimed at interfering with, damaging or destroying critical infrastructure through malicious cyber activities as part of hybrid activities.</p>	

	Name	Identifying information	Statement of Reasons	Date of listing
17.	<p>International Russophile Movement</p> <p>(Russian: Международное движение русофилов)</p> <p>(French: Mouvement International Russophile)</p>		<p>The International Russophile Movement is a movement responsible for amplifying destabilising narratives globally, on behalf of the Government of the Russian Federation. The movement has strong ties with the Russian Ministry of Foreign Affairs, receiving endorsements for their work. Russian foreign minister Sergey Lavrov has given keynote speeches in congress meetings of the movement. The movement is also associated with the Kremlin's top ideologue Aleksandr Dugin and media oligarch Konstantin Malofeev. The Government of the Russian Federation uses the movement as a cover for manipulating the public opinion of other countries, promoting anti-Western sentiment and echoing other Kremlin speaking points.</p> <p>Therefore, the International Russophile Movement is supporting or implementing actions attributable to the Government of the Russian Federation which undermine or threaten stability or security in the Union or in a third country (Ukraine) by engaging in, supporting or otherwise facilitating the use of information manipulation and interference.</p>	+?

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