

Brussels, 12 March 2025
(OR. en)

6889/1/25
REV 1

LIMITE

CORLX 283
CFSP/PESC 413
RELEX 310
FIN 283
COEST 216

NOTE

From: General Secretariat of the Council
To: Delegations
Subject: Council Decision and Implementing Regulation concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine

DOCUMENT PARTIALLY ACCESSIBLE TO THE PUBLIC (22.09.2025)

1. On 17 March 2014 the Council adopted Decision 2014/145/CFSP and Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. The measures were last renewed by Decision (CFSP) 2024/2456, until 15 March 2025.
2. On the basis of a review of Decision 2014/145/CFSP, the application of the restrictive measures should be renewed for another 6 months, until 15 September 2025.
3. On 28 February 2025, the High Representative submitted proposals for a Council Decision amending Decision 2014/145/CFSP (doc. 5645/25) and a Council Implementing Regulation implementing Regulation (EU) No 269/2014 (doc. 5647/25), concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.

4. On 3 March 2025, the Foreign Relations Counsellors Working Party (RELEX) discussed the texts of the draft Council Decision and Implementing Regulation. On 3 March and 7 March (through written consultation), RELEX agreed on the text of the draft letters of reply to observations. Since it is impossible to notify by registered letter in Russia and Belarus, individual notification letters cannot be sent to persons and entities whose addresses are in Russia and Belarus.
5. In these circumstances, COREPER is invited to:
- confirm the agreement on the draft Council Decision, Implementing Regulation and the letters of reply;
 - decide, given the urgency and in accordance with the first subparagraph of Article 12(1) of the Council's Rules of Procedure, that the Council use the written procedure to:
 - adopt the Council Decision amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine as set out in document 6886/25, subject to finalisation of the text by the legal/linguistic experts;
 - adopt the Council Implementing Regulation implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine as set out in document 6887/25, subject to finalisation of the text by the legal/linguistic experts;
 - approve the letters of reply as set out in Annex I to this note;
 - approve the general template for notification letters as set out in Annex II to this note;
 - recommend that the Council approve the notices to be published in the Official Journal as set out in Annexes III, IV and V to this note.

DELETED FROM THIS POINT UNTIL PAGE 163.



General template for letters of individual notification

This is to inform you that the Council of the European Union has decided that you/your client/your company/your entity should continue to be included in the list of persons and entities subject to restrictive measures in the Annex to Council Decision 2014/145/CFSP, as amended by Council Decision (CFSP) 2025/xxx¹, and Council Regulation (EU) No 269/2014, as implemented by Council Implementing Regulation (EU) 2025/xxx², concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.

Your attention is drawn to the possibility of making an application to the competent authorities of the relevant Member State(s) as indicated in the websites in Annex II to Council Regulation (EU) No 269/2014, in order to obtain an authorisation to use frozen funds for basic needs or specific payments (cf. Article 4 of the Regulation).

Your attention is drawn to the possibility of submitting a request to the Council, **before 2 June 2025**, together with supporting documentation, that the decision to include you/your client/your company on the above-mentioned list should be reconsidered, to the following address:

Council of the European Union
General Secretariat
RELEX.1
Rue de la Loi/Wetstraat 175
1048 Bruxelles/Brussel
BELGIQUE/BELGIË
e-mail: sanctions@consilium.europa.eu

¹ OJ L...,, p ...

² OJ L...,, p ...

The attention of the persons and entities concerned is also drawn to the possibility of challenging the Council's decision before the General Court of the European Union, in accordance with the conditions laid down in Article 275, 2nd paragraph, and Article 263, 4th and 6th paragraphs, of the Treaty on the Functioning of the European Union.

In relation to the obligation to report funds or economic resources within the jurisdiction of a Member State [belonging to, owned, held or controlled by your client]/[belonging to, owned, held or controlled by your person/company/entity], you are informed of the Notice for the attention of natural or legal persons, entities or bodies subject to the restrictive measures provided for in Council Decision 2014/145/CFSP and Council Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine (2025/C xxx/xx)³.

[You are also informed of the Notice (2025/Cxxx/xx) for the attention of the data subjects to whom the restrictive measures provided for in Council Decision 2014/145/CFSP and Council Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine apply⁴.]

³ OJ C...,, p ...

⁴ OJ C...,, p ...

Notice for the attention of the persons and entities subject to the restrictive measures provided for in Council Decision 2014/145/CFSP¹, as amended by Council Decision (CFSP) 2025/[number]⁺, and in Council Regulation (EU) No 269/2014² as implemented by Council Implementing Regulation (EU) 2025/[number]⁺⁺ concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine

The following information is brought to the attention of the persons and entities that appear in the Annex to Council Decision 2014/145/CFSP, as amended by Council Decision (CFSP) 2025/[number]⁺, and in Annex I to Council Regulation (EU) No 269/2014, as implemented by Council Implementing Regulation (EU) 2025/[number]⁺⁺ concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.

The Council of the European Union, after having reviewed the list of persons and entities designated in the above-mentioned Annexes, has determined that the restrictive measures provided for in Council Decision 2014/145/CFSP and in Council Regulation (EU) No 269/2014 should continue to apply to those persons and entities.

The attention of the persons and entities concerned is drawn to the possibility of making an application to the competent authorities of the relevant Member State(s) as indicated in the web sites in Annex II to Council Regulation (EU) No 269/2014, in order to obtain an authorisation to use frozen funds for basic needs or specific payments (cf. Article 4 of the Regulation).

The persons and entities concerned may submit a request to the Council, together with supporting documentation, that the decision to include them on the above-mentioned list should be reconsidered, to the following address **before 2 June 2025**:

¹ OJ L 78, 17.03.2014, p. 16.

⁺ OJ: please insert number and publication details for Decision in document 5646/25.

² OJ L 78, 17.03.2014, p. 6.

⁺⁺ OJ: please insert number and publication details for Regulation in document 5648/25.

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General Secretariat

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The attention of the persons and entities concerned is also drawn to the possibility of challenging the Council's decision before the General Court of the European Union, in accordance with the conditions laid down in Article 275, 2nd paragraph, and Article 263, 4th and 6th paragraphs, of the Treaty on the Functioning of the European Union.

Notice for the attention of the data subjects to whom the restrictive measures provided for in Council Decision 2014/145/CFSP¹ and Council Regulation (EU) No 269/2014² concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine apply

The attention of data subjects is drawn to the following information in accordance with Article 16 of Regulation (EU) 2018/1725.

The legal bases for this processing operation are Council Decision 2014/145/CFSP, as amended by Council Decision (CFSP) 2025/[number]⁺, and Council Regulation (EU) No 269/2014, as implemented by Council Implementing Regulation (EU) 2025/[number]⁺⁺.

The controller of this processing operation is the Council of the European Union represented by the Director-General of Directorate-General for External Relations (RELEX) of the General Secretariat of the Council and the department entrusted with the processing operation is RELEX.1 that can be contacted at:

Council of the European Union
General Secretariat
RELEX.1
Rue de la Loi/Wetstraat 175
1048 Bruxelles/Brussel
BELGIQUE/BELGIË
e-mail: sanctions@consilium.europa.eu

¹ OJ L 78, 17.3.2014, p. 16.

² OJ L 78, 17.03.2014, p. 6.

⁺ OJ: please insert number and publication details for Decision in 5646/25.

⁺⁺ OJ: please insert number and publication details for Regulation in 5648/25.

The GSC's Data Protection Officer can be contacted at:

Data Protection Officer

data.protection@consilium.europa.eu

The purpose of the processing operation is the establishment and updating of the list of persons subject to restrictive measures in accordance with Decision 2014/145/CFSP, as amended by Council Decisions (CFSP) 2025/[number]⁺, and Regulation (EU) No 269/2014, as implemented by Council Implementing Regulation (EU) 2025/[number]⁺⁺.

The data subjects are the natural persons who fulfil the listing criteria as laid down in Decision 2014/145/CFSP and Regulation (EU) No 269/2014.

The personal data collected includes data necessary for the correct identification of the person concerned, the statement of reasons and any other data related to the grounds for listing.

The legal bases for the handling of personal data are the Council Decisions adopted under Article 29 TEU and Council Regulations adopted under Article 215 TFEU designating natural persons (data subjects) and imposing the freezing of assets and travel restrictions.

Processing is necessary for the performance of a task carried out in the public interest in accordance with Article 5(1)(a) and for compliance with legal obligations laid down in above-mentioned legal acts to which the controller is subject in accordance with Article 5(1)(b) of Regulation (EU) 2018/1725.

Processing is necessary for reasons of substantial public interest in accordance with Article 10(2)(g) of Regulation (EU) 2018/1725.

The Council may obtain personal data of data subjects from Member States and/or the European External Action Service. The recipients of the personal data are Member States, the European Commission and the European External Action Service.

⁺ OJ: please insert number and publication details for Decision in 5646/25.

⁺⁺ OJ: please insert number and publication details for Regulation in 5648/25.

All personal data processed by the Council in the context of EU autonomous restrictive measures will be retained for 5 years from the moment the data subject has been removed from the list of persons subject to the asset freeze or the validity of the measure has expired or, if a legal action is brought before the Court of Justice, until a final judgment has been handed down. Personal data contained in documents registered by the Council are kept by the Council for archiving purposes in the public interest, within the meaning of Art. 4(1)(e) of Regulation (EU) 2018/1725.

The Council may need to exchange personal data regarding a data subject with a third country or international organisation in the context of the Council's transposition of UN designations or in the context of international cooperation regarding the EU's restrictive measures policy.

In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s), pursuant to Article 50 of Regulation (EU) 2018/1725:

- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for the establishment, exercise or defence of legal claims.

No automated decision-making is involved in the processing of the data subject's personal data.

Data subjects have the right of information and the right of access to their personal data. They also have the right to correct and complete their data. Under certain circumstances, they may have the right to obtain the erasure of their personal data, or the right to object to the processing of their personal data or to ask for it to be restricted.

Data subjects can exercise these rights by sending an e-mail to the controller with a copy to the Data Protection Officer as indicated above.

Attached to their request, the data subjects must provide a copy of an identification document to confirm their identity (ID card or passport). This document should contain an identification number, country of issue, period of validity, name, address and date of birth. Any other data contained in the copy of the identification document such as photo or any personal characteristics may be blacked out.

Data subjects have the right to lodge a complaint with the European Data Protection Supervisor in accordance with Regulation (EU) 2018/1725 (edps@edps.europa.eu).

Before doing so, it is recommended that data subjects first try to obtain a remedy by contacting the controller and/or the Data Protection Officer of the Council.

Without prejudice to any judicial, administrative or non-judicial remedy, data subjects may lodge a complaint with the European Data Protection Supervisor in accordance with Regulation (EU) No 2018/1725 (edps@edps.europa.eu).

Notice for the attention of the natural or legal persons, entities or bodies subject to the restrictive measures provided for in Council Decision 2014/145/CFSP¹, as amended by Council Decision (CFSP) 2025/[number]⁺, and in Council Regulation (EU) No 269/2014² as implemented by Council Implementing Regulation (EU) 2025/[number]⁺⁺ concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine

The following information is brought to the attention of the natural or legal persons, entities or bodies that appear in the Annex to Council Decision 2014/145/CFSP, as amended by Council Decision (CFSP) 2025/[number]⁺, and in Annex I to Council Regulation (EU) No 269/2014 as implemented by Council Implementing Regulation (EU) 2025/[number]⁺⁺ concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.

Article 9(2) of Regulation (EU) No 269/2014 requires that those natural or legal persons, entities or bodies must report, before 1 September 2022 or within 6 weeks from the date of listing in Annex I, whichever is latest, funds or economic resources within the jurisdiction of a Member State belonging to, owned, held or controlled by them, to the competent authority of the Member State where those funds or economic resources are located. They must cooperate with the national competent authority in any verification of such information. Failure to comply with these obligations will be considered as circumvention of the measures on the freezing of funds and of economic resources.

The information to be reported must be sent to the competent authority of the relevant Member State, via its website as indicated in Annex II to Regulation (EU) No 269/2014³.

¹ OJ L 78, 17.3.2014, p. 16.

⁺ OJ: please insert number and publication details for Decision in document 5646/25.

² OJ L 78, 17.03.2014, p. 6.

⁺⁺ OJ: please insert number and publication details for Regulation in document 5648/25.

³ Last consolidated version available at EUR-Lex - <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014R0269-20241216>