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8633/25

LIMITE

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CFSP/PESC 659
RELEX 540
COEST 348
FIN 483**

'I/A' ITEM NOTE

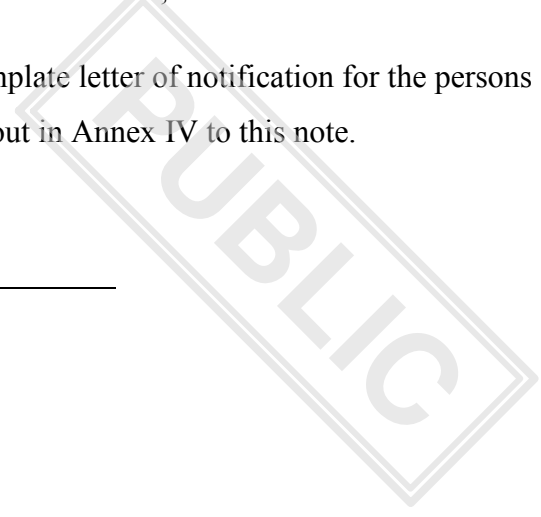
From: General Secretariat of the Council
To: Permanent Representatives Committee/Council

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

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.
2. In its conclusions of 19 December 2024, the European Council reiterated its resolute condemnation of Russia's war of aggression against Ukraine, which constitutes a manifest violation of the Charter of the United Nations, and reaffirmed its continued support for Ukraine's independence, sovereignty and territorial integrity within its internationally recognised borders. The European Council stated that efforts to further limit Russia's ability to wage war must continue. It also expressed the Union's readiness to step up pressure on Russia, including by adopting further sanctions.

3. On 6 May 2025, the High Representative submitted proposals for a Council Decision amending Decision 2014/145/CFSP (doc. 8319/25) and a Council Implementing Regulation implementing Regulation (EU) No 269/2014 (doc. 8321/25), concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. On 8 May, the High Representative submitted additional proposals for a Council Decision amending Decision 2014/145/CFSP (doc. 8696/25) and a Council Implementing Regulation implementing Regulation (EU) No 269/2014 (doc. 8697/25), concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.
4. Since it is impossible to notify by registered letter in Russia, individual notification letters cannot be sent to the persons and entities whose addresses are in Russia.
5. Coreper is invited to:
 - agree the texts of the draft Council Decisions and draft Council Implementing Regulations;
 - recommend that the Council 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, after finalisation of the text by the legal/linguistic experts, in document 8320/25;
 - recommend that the Council 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, after finalisation of the text by the legal/linguistic experts, in document 8322/25;

- recommend that the Council approve the notices to be published in the Official Journal ('C' Series), as set out in Annexes I, II and III to this note;
- recommend that the Council approve the template letter of notification for the persons and entities whose address is known, as set out in Annex IV to this note.



Notice for the attention of the natural and legal persons, entities and bodies subject to the restrictive measures provided for in Council Decision 2014/145/CFSP¹, as amended by Council Decision (CFSP) 2025/[number]⁺, and 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, entities and 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.

The Council of the European Union has decided that those persons, entities and bodies should be included on the list of persons, entities and bodies subject to restrictive measures provided for in Council Decision 2014/145/CFSP and in Council Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. The grounds for the designation of those persons, entities and bodies appear in the relevant entries in those Annexes.

The attention of those persons, entities and bodies 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).

¹ OJ L 78, 17.3.2014, p. 16.

⁺ OJ: please insert number and publication details for Decision in 8320/25.

² OJ L 78, 17.3.2014, p. 6.

⁺⁺ OJ: please insert number and publication details for Implementing Regulation in 8322/25.

The persons, entities and bodies 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 4 June 2025**.

Council of the European Union

General Secretariat

RELEX.1

Rue de la Loi/Wetstraat 175

1048 Bruxelles/Brussel

BELGIQUE/BELGIË

email: sanctions@consilium.europa.eu

The attention of the persons, entities and bodies 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, second paragraph, and Article 263, fourth and sixth paragraphs, of the Treaty on the Functioning of the European Union.

Notice for the attention of the natural and legal persons, entities and bodies subject to the restrictive measures provided for in Council Decision 2014/145/CFSP¹, as amended by Council Decision (CFSP) 2025/[number]⁺, and 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, entities and 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 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 8320/25.

² OJ L 78, 17.3.2014, p. 6.

⁺⁺ OJ: please insert number and publication details for Implementing Regulation in 8322/25.

³ Last consolidated version available at [EUR-Lex - 02014R0269-20250316 - EN - EUR-Lex](#)

Notice 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 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 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

email: sanctions@consilium.europa.eu

⁺ OJ: please insert number and publication details for Decision in 8320/25.

⁺⁺ OJ: please insert number and publication details for Implementing Regulation in 8322/25.

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.

⁺ OJ: please insert number and publication details for Decision in 8320/25.

⁺⁺ OJ: please insert number and publication details for Implementing Regulation in 8322/25.

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.

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).

Template letter for the persons and entities whose addresses are known

This is to inform you that the Council of the European Union has decided to include [you], [your entity/your company] on the list of persons, entities and bodies subject to restrictive measures in the Annex to Council Decision 2014/145/CFSP, as amended by Council Decision (CFSP) 2024/[number]¹, and in Annex I to Council Regulation (EU) No 269/2014, as implemented by Council Implementing Regulation (EU) 2024/[number]² concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. The grounds for designation appear in the relevant entries in those Annexes.

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).

You may submit a request to the Council, together with supporting documentation, that the decision to include [you], [your entity/your company] on the above-mentioned list should be reconsidered, to the following address, **before 4 June 2025**:

Council of the European Union

General Secretariat

RELEX.1

Rue de la Loi/Wetstraat 175

1048 Bruxelles/Brussel

BELGIQUE/BELGIË

email: sanctions@consilium.europa.eu

¹ OJ L ... , DD/MM/YYYY

² OJ L ... , DD/MM/YYYY

Your attention 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 person] [your entity/your company], 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..., DD/MM/YYYY

⁴ OJ C..., DD/MM/YYYY