

End of Russian gas imports to the EU: closer than ever

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On 17 December, the European Parliament formally adopted the text of a regulation intended to complete the EU's phase-out of natural gas imports from Russia. The agreement had been reached on 3 December during the third round of trilogue negotiations involving representatives of the Danish Presidency of the Council, the European Parliament, and the European Commission. The legislative process is expected to be finalised with the Council's formal approval – anticipated at the end of January – which should be largely procedural. The provisions are set to take effect six weeks after the regulation enters into force, most likely from March 2026.

Although the adoption of a legal ban on imports of Russian gas is set to come only after years of effort – and not without resistance, most notably from Hungary and Slovakia – it nonetheless represents a success and a testament to the EU's resolve in pursuing a consistent course despite a shifting international context. At the same time, the regulation's real significance will ultimately depend on how rigorously and comprehensively it is implemented, both at EU level and by individual member states.

Substance and context

The document introduces a legally binding, phased ban on imports of Russian gas, both in liquefied form (fully effective from the end of 2026) and via pipeline deliveries (fully effective from autumn 2027) – see Appendix for further details.

To ensure the effectiveness of the ban, it will be accompanied by the introduction and implementation of the following measures:

- a system of prior import authorisations and a requirement to provide proof of the gas's origin, from which certain categories of exporting countries will be exempt (for instance, those that themselves prohibit imports from Russia, or those exporting substantial volumes to the EU),
- an obligation to submit national diversification plans, setting out the means of achieving this objective and the challenges involved,
- penalties for non-compliance with the provisions of the regulation.

The new regulation also includes a clause allowing for its temporary suspension should a member state declare a state of emergency in the gas sector.

The new legislation is a direct result of the European Commission's proposal from June 2025 (see '[The European Commission proposes that the EU permanently cease gas imports from Russia](#)') and represents the latest in a series of measures taken by the EU since the

outbreak of Russia's full-scale war against Ukraine – initiated with the 2022 REPowerEU strategy – to end dependence on Russian hydrocarbons. Under current plans, the regulation is to be formally adopted on 26 January at the General Affairs Council.

Since February 2022, the EU has significantly reduced its imports of Russian gas: volumes fell from more than 167 bcm in 2021 to 38.5 bcm in 2024. Russia's share of total EU gas imports declined from 45% before February 2022 to 12% in 2025 (see Bruegel's *European natural gas imports* dataset). At the same time, in a handful of cases the complete termination of imports has proven – and continues to prove – difficult. Supplies from Russia via the TurkStream pipeline, running through the Black Sea and Turkey, are still reaching Greece, Slovakia, and Hungary, while imports of Russian LNG – mainly into terminals in Belgium, France, and Spain – remain higher than in the pre-war year of 2021.

The significance of the new provisions

The regulation introduces not a temporary restriction, but a permanent ban on imports of Russian gas. In this sense, it represents a clear success for the EU. It is the consequence not only of four years of Moscow's hostile actions, but also of the recognition that dependence on Russian gas weakens both the EU as a whole and its individual member states – and that Russia has exploited this dependence as an instrument in its hybrid war against Europe. The scale of this achievement, and the importance of the agreement on the regulation, have been underscored by the President of the European Commission, the Commissioner for Energy, representatives of the European Parliament, the Danish Presidency of the Council, and the Director of the International Energy Agency. Yet it is also an achievement of Poland and other countries in the region (including Lithuania, Latvia, and Estonia), as it marks the Europeanisation of the objectives and instruments of their energy security policies.

The adoption of the new legislation underlines the EU's determination and policy consistency, despite the United States' increasingly incoherent approach to Russian gas over the past year. While simultaneously seeking to expand exports of its own LNG to Europe and pressing EU member states to increase purchases, Washington has also been intensifying efforts to end the war in Ukraine and to normalise relations with Russia, including in the energy sphere. From time to time, media reports have also suggested the possibility of US investors becoming involved in currently unused routes for transporting Russian gas to Europe (such as Nord Stream 2).

The regulation therefore reflects the EU's steadfast commitment to its objectives in this area. It may also be intended to dispel speculation and curtail expectations among European market participants of any potential return to imports from Russia, while preventing Moscow – or other third parties – from exploiting this prospect to deepen divisions within the EU.

Controversy within the EU

The regulation is the outcome of a difficult process – now in its fourth year – which has generated tensions between member states and stakeholders in Europe's gas and energy markets as the EU has sought to minimise its energy ties with Russia. In the near term, the Commission plans to present a separate legislative proposal aimed at achieving a complete phase-out of imports of Russian oil by the end of 2027. A forerunner of these efforts is the

requirement set out in the regulation for member states that continue to import Russian crude to submit national oil supply diversification plans similar to those foreseen for gas.

Efforts are also under way to eliminate dependence on Russia in the field of nuclear energy, although their successful completion appears far less straightforward, given the multi-layered nature of these links and the significant role played by Russian entities in Europe's nuclear fuel supply chains. At the same time, steps taken by the Czech government, among others, demonstrate that a break with Russia in this area is nevertheless feasible.

Not all EU member states have accepted the phase-out of Russian gas imports, with Hungary and Slovakia in particular announcing that they will challenge the regulation before the Court of Justice of the European Union once it has been adopted. Diverging views among member states on the pace, scale, and modalities of reducing reliance on Russian gas have been evident since the very beginning of the debate. These differences also help to explain why Russian gas was not included in EU sanctions packages at an earlier stage (the ban on LNG imports was introduced only in the most recent, 19th package and is due to take effect from January 2027), as well as why work on the current legislation has been protracted.

This was one of the main reasons why the Commission based the regulation on EU trade and energy law, allowing it to be adopted by a qualified majority rather than unanimity. That explains why, for instance, Bratislava linked its consent to successive sanctions packages against Russia (despite having no objections to their substance) – which required unanimity – to the formulation and implementation of guarantees related to phasing out reliance on Russian hydrocarbons. To dispel concerns about the legal consequences of introducing a ban, the new rules are intended to allow European importers to terminate contracts with Russian suppliers by invoking force majeure clauses.

Implementation and the effectiveness of the new legislation

Even as the EU awaits the entry into force of the new provisions, concerns are emerging as to whether they can be implemented fully and without loopholes. Experts and industry representatives, in particular, are questioning the resolve, timeliness, and completeness of implementation in the states opposed to the regulation – Hungary and Slovakia – as well as the effectiveness of the instruments available to the Commission (such as diversification plans and penalties) to compel compliance. Such concerns are likely to grow should Washington make progress in efforts aimed at securing peace between Russia and Ukraine or at reviving US–Russian economic contacts.

The implementation of the regulation would likely be facilitated if Bratislava and Budapest were to receive tangible support for diversification. Co-financing the necessary gas infrastructure, and assistance in securing the most cost-effective supply sources and transport routes to both countries, could reduce the scale of required investment and mitigate the cost increases associated with new suppliers and corridors. Alongside political arguments, the issue of higher prices for non-Russian gas – and, more broadly, energy costs – remains one of the key concerns raised by Slovakia and Hungary in debates on phasing out imports from Russia.

Diversifying supplies to both countries may be facilitated, for example, by the European Commission's announcement that it will accelerate and support efforts to enable reverse-

flow transmission via the Trans-Balkan pipeline by designating it as one of eight European 'energy highways' under the European Grids Package published on 10 December. At the same time, the effectiveness of the EU's initiative remains uncertain, and the Trans-Balkan pipeline is only one of several instruments that could help Bratislava and Budapest move away from Russian gas. Their reluctance to cut ties also reflects the tangible profits generated by reselling surplus volumes on the market – benefits accruing to local partners of Gazprom and, by extension, to individuals across the broader ruling establishment in both countries.

The future robustness of the ban must also be regarded as uncertain, particularly with regard to preventing circumvention via third countries such as Azerbaijan or Turkey (and potentially others, including LNG exporters such as Qatar). In theory, Azerbaijani or Turkish entities could resell to EU buyers Russian gas imported under their bilateral contracts with Gazprom. On 8 December – after the EU had already reached an agreement on the regulation – the Hungarian prime minister held talks with the Turkish president on the continuation of supplies from Russia.

For this reason, the Bulgarian–Turkish border point at Strandzha will become a key entry and monitoring node for enforcing the new rules, including the verification of proof of origin. It remains unclear, however, how significant the resources required to carry out such checks as thoroughly as possible will prove to be in minimising the risk of circumvention, and how this will ultimately affect the final cost of supplies.

Finally, questions arise as to the implications of implementing the regulation for third countries, including the future terms for the transit of Russian gas through EU territory – above all to Serbia, but also to Moldova (Transnistria), where deliveries will formally still be permitted. Together with the uncertainties outlined above, this highlights the critical importance of South-East Europe for ensuring the integrity of the new rules. It is also necessary to develop principles for technical and sectoral – and, inevitably, pragmatic political – cooperation on issues related to Russian gas with the EU's neighbours and partners, first and foremost the Energy Community countries, as well as Turkey and Azerbaijan.

Appendix. Phased implementation and compliance rules for the EU ban on Russian gas imports

According to the agreed preliminary version of the regulation, imports of gas from Russia will be prohibited as follows:

- for short-term contracts concluded after 17 June 2025 (the date on which the Commission presented its proposal) and for spot transactions – with **immediate effect**;
- in the case of short-term contracts concluded before 17 June 2025:
- **effective from 25 April 2026** for LNG,

- **effective from 17 June 2026** for pipeline deliveries;
- in the case of long-term contracts:
- **effective from 1 January 2027** for LNG (in line with the 19th sanctions package),
- **effective from 30 September 2027** or – if a member state encounters difficulties filling its storage facilities – from 1 November 2027 for pipeline gas.

The effective enforcement and implementation of the adopted provisions are to be ensured by:

1. a system of import authorisations and a requirement to provide proof of the gas's origin
:

- with respect to imports from Russia during the transitional period, the relevant information must be submitted at least one month prior to the planned delivery,
- for imports from non-Russian sources, at least five days in advance (and seven days in advance for the Turkey–Bulgaria entry point at Strandzha).

Import authorisations will not apply to suppliers that sold more than 5 bcm of gas to the EU in 2024 and themselves prohibit or restrict imports of Russian gas, nor to countries without gas import infrastructure. At the same time, the European Commission may revoke the exemption if an exporter is found to be facilitating circumvention of the regulation's provisions.

2. national gas supply diversification plans

They are to be submitted by all member states and are to remain subject to rules of professional secrecy, unless the state concerned consents to disclosure, and are to set out the measures taken and any potential challenges to the timely termination of imports of Russian gas.

The regulation also introduces a requirement for companies based in EU member states to inform the European Commission and the relevant national authorities – within four weeks of the regulation's entry into force – whether they hold contracts for importing gas from Russia.

The new legislation requires member states that continue to import gas from Russia to submit national diversification plans. At the same time, an obligation to provide similar plans for crude oil will be introduced; however, the Commission is expected to present a separate legislative proposal in the near term aimed at achieving a complete phase-out of oil imports by the end of 2027.

3. penalties for non-compliance with the provisions

EU member states are required to impose proportionate and dissuasive penalties for breaches of the regulation, including the highest-level sanctions, on both legal entities and natural persons. For legal persons, one of the following penalties may be imposed:

- a maximum penalty of at least 3.5% of the company's total annual turnover,
- a fixed fine of at least €40 million,
- A penalty amounting to 300% of the estimated transactional turnover.

For natural persons, the maximum penalty should not be lower than €2.5 million. Member states will be required to adopt the necessary national implementing measures within two years of the regulation's entry into force.

A so-called **suspension clause** is also included, allowing for the temporary suspension of the new provisions in the event of sudden developments that threaten security of supply in one or more member states. The mechanism is to be activated by the Commission when a member state declares a gas-sector state of emergency under the rules set out in the Security of Gas Supply Regulation. Any suspension is to be limited to measures necessary to mitigate the crisis, apply only to the purchase of Russian gas under short-term contracts, and last for no more than four weeks.