Dear G7 and European Union leaders,

Civil society appeal to EU and G7: Plug energy sanctions loopholes and strengthen enforcement to end the war

The European Union and G7 should tighten their grip on Russia’s key revenue streams from exports of fossil fuels, ban Russian LNG gas imports and close all loopholes in existing sanctions. It is good that Europe supports Ukraine financially and militarily. But it is just as important to fully end the financing of the Russian war machine through fossil fuel imports, which is still a reality, say more than 280 European, international and Ukrainian NGOs in a public appeal to leaders.

Sanctioning countries have significantly reduced their reliance on Russian fossil fuels, but more must be done to stop purchasing fuels that finance the Kremlin’s war chest. Through measures such as the EU oil import ban and G7 price cap, Russia’s export earnings from oil have been cut by 14%, costing them EUR 34 billion. However, the oil price cap’s impact is far short of what could have been achieved with greater monitoring and enforcement of the policy, paired with a lower price level. Two years on, the EU and G7 have purchased EUR 202 bln of fossil fuels from Russia since Putin’s full-scale invasion of Ukraine.

Over the past two years, the EU has shown a steadfast commitment to supporting Ukraine in the common struggle against the aggressor, recognising Russia’s war as an onslaught on international rules-based order, democracy and human rights. We welcome the recent decision by the European Council to support Ukraine with EUR 50 billion in aid. However, the EU’s recent aid commitment represents 27% of their total fossil fuel imports purchased from Russia since the beginning of their full-scale invasion, estimated at over EUR 185 billion. More needs to be done to support our allies and wean the EU off of the Russian fossil fuel exports that fund the war, including a complete phase-out of Russian pipeline gas.
The EU has introduced 12 consecutive sanctions packages on the Russian economy, designed to deprive the aggressor of access to finance, insurance, advanced technologies, and engineering services and to limit its export earnings. The EU and G7 have also adopted a globally applicable price cap on Russian oil in December 2022. Yet, insufficient enforcement and the lack of comprehensive sanctions against Russia’s fossil fuel exports are downgrading the efficiency of the sanctions regime and undermining the overall efforts to deprive Russia of economic means for waging war.

Russia’s 2024 federal budget increases to the military-industrial complex doubled compared to 2022, unprecedented military spending since Soviet times. The major shift sends a third of all governmental funding to the army, threatening regional stability and the future of democracy and security in Europe. Meanwhile, Russia expects to replenish its budget with 11.5 trillion rubles (USD 127 billion) from oil and gas sector revenues. Russia can spend so lavishly on its military mainly because of its oil and gas revenues.

The EU and G7 countries contribute to this expanding war chest by inadequately enforcing sanctions against Russian oil and gas and leaving loopholes wide open that Russia exploits daily.

In solidarity with the Ukrainian people, the groups demand the G7 and EU take the following actions:

1. **Fully enforce and lower price caps on Russian crude oil and oil products** and introduce transparent and verifiable compliance mechanisms for oil traders and shippers, especially those who operate European-owned and P&I (Protection & Indemnity) insured tankers that export Russian oil. The price cap on Russian crude oil should be set much closer to its production cost (averaging USD 15 per barrel), at USD 30 per barrel, which would have slashed Russia’s revenue by EUR 37 bn (25%).

2. **Prevent Russia from further expanding the shadow fleet of dangerous, practically uninsured and unaccountable old tankers**, operating through illegal and dubious management arrangements, and lacking transparency in ownership. This is necessary not only to reduce Russia’s ability to finance the war of aggression with oil money but also to prevent looming environmental catastrophes from possible major oil spills. The EU and G7 should introduce a spill insurance verification programme for vessels that travel through their waters. This could exclude ‘shadow’ tankers without spill insurance from travelling through their most travelled route from Baltic ports whilst reducing the risk of environmental catastrophe. If this policy banned many ‘shadow’ tankers from transporting oil from the Baltic and Black Sea ports, it could increase Russia’s reliance on legally insured vessels and enhance the leverage of the oil price cap policy.

3. **Close the “refining loophole”**, which allows EU and G7 countries to import oil products — mainly diesel, jet fuel and gasoline — produced from Russian oil at refineries in third countries like India, Turkey or UAE. The “refining loophole” legally allows Russian oil to be
processed and flow into the EU and G7 countries, preserving Russian export volumes and earnings.

4. Fully ban liquefied natural gas (LNG) imports from Russia and its transhipment in European ports for exports to other countries. In 2022-2023, the exports of Russian LNG to global markets were expanding, while the opposite is required to cut the Kremlin’s budgetary income that funds the war of aggression and avoid the severe climate impacts of uncontrolled and unaccounted methane emissions in the Russian LNG supply chain. The EU should keep true to the commitments under the REpowerEU plan and also fully ban Russian pipeline gas imports.

5. Take decisive actions to reduce oil and gas consumption and end import dependency to deflate the Russian war economy. Such actions include requiring company car fleets in Europe to shift to all-electric vehicles, which would help minimise petroleum demand and oil prices. Further efforts can consist of banning the installation of gas-fired boilers in new or retrofitted buildings, facilitating the accelerated market roll-out of heat pumps, prohibiting the production of single-use plastics, adopting and implementing ambitious energy efficiency improvement plans and streamlining permitting and providing governmental support for the construction of renewable energy projects. Follow-up on implementation of widely announced decarbonisation commitments is also essential.

We underscore that tightening sanctions against Russian oil and gas exports isn’t just about ending a war - it’s about dismantling the foundation that enables autocracy to thrive. It’s a global imperative to foster energy independence, peace, climate action and democratic resilience. We also must swiftly welcome Ukraine into the European Union.

Signatories:

1. Transport & Environment
2. NGO Center for Environmental Initiatives “Ecoaction”
3. Razom We Stand
4. Centre for Research on Energy and Clean Air (CREA)
5. Deutsche Umwelthilfe
6. Leave it in the Ground Initiative (LINGO)
7. Green Transition Denmark
8. Bond Beter Leefmilieu
9. Ukrainian Security and Cooperation Center
10. Danube-Carpathian Programme
11. Climate Action for Lifelong Learners (CALL)
12. For a Better Bayou
13. 2Celsius
14. VšĮ Žiedinė ekonomika
15. EKOenergy ecolabel
<table>
<thead>
<tr>
<th>No.</th>
<th>Organization Name</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>17</td>
<td>Oil and Gas Action Network</td>
<td>USA</td>
</tr>
<tr>
<td>18</td>
<td>Wall of Women</td>
<td>USA</td>
</tr>
<tr>
<td>19</td>
<td>Institute of legislative ideas</td>
<td>Ukraine</td>
</tr>
<tr>
<td>20</td>
<td>Egyptian Green Party</td>
<td>Egypt</td>
</tr>
<tr>
<td>21</td>
<td>Earth Action, Inc.</td>
<td>USA</td>
</tr>
<tr>
<td>22</td>
<td>Disability Peoples Forum Uganda</td>
<td>Uganda</td>
</tr>
<tr>
<td>23</td>
<td>International Partnership for Human Rights</td>
<td>Belgium</td>
</tr>
<tr>
<td>24</td>
<td>Public Eye</td>
<td>Switzerland</td>
</tr>
<tr>
<td>25</td>
<td>Clean Air Action Group</td>
<td>Hungary</td>
</tr>
<tr>
<td>26</td>
<td>Expert Forum (EFOR)</td>
<td>Romania</td>
</tr>
<tr>
<td>27</td>
<td>ICO &quot;Environment - People - Law&quot;</td>
<td>Ukraine</td>
</tr>
<tr>
<td>28</td>
<td>NGO &quot;Technology of Progress&quot;</td>
<td>Ukraine</td>
</tr>
<tr>
<td>29</td>
<td>NGO &quot;Open Data Association&quot;</td>
<td>Ukraine</td>
</tr>
<tr>
<td>30</td>
<td>Milieudefensie</td>
<td>Friends of the Earth NL</td>
</tr>
<tr>
<td>31</td>
<td>NGO Ecoclub Rivne</td>
<td>Ukraine</td>
</tr>
<tr>
<td>32</td>
<td>Transform Scotland</td>
<td>Scotland</td>
</tr>
<tr>
<td>33</td>
<td>Uplift</td>
<td>United Kingdom</td>
</tr>
<tr>
<td>34</td>
<td>NGO Sustainable Development Agency SYNERGY</td>
<td>Ukraine</td>
</tr>
<tr>
<td>35</td>
<td>NGO Social Initiative &quot;City of the Sun&quot;</td>
<td>Ukraine</td>
</tr>
<tr>
<td>36</td>
<td>Black Sea Women’s Club</td>
<td>Ukraine</td>
</tr>
<tr>
<td>37</td>
<td>NGO Environmental Club Eremurus</td>
<td>Ukraine</td>
</tr>
<tr>
<td>38</td>
<td>Anti-corruption Headquarters</td>
<td>Ukraine</td>
</tr>
<tr>
<td>39</td>
<td>NGO Ekoltava</td>
<td>Ukraine</td>
</tr>
<tr>
<td>40</td>
<td>Institute for Social and Economic Transformation</td>
<td>Ukraine</td>
</tr>
<tr>
<td>41</td>
<td>Planet Botanical Garden</td>
<td>Ukraine</td>
</tr>
<tr>
<td>42</td>
<td>Plato NGO</td>
<td>Ukraine</td>
</tr>
<tr>
<td>43</td>
<td>Ukrainian Nature Conservation Group</td>
<td>Ukraine</td>
</tr>
<tr>
<td>44</td>
<td>Anti-Corruption Research and Education Centre</td>
<td>Ukraine</td>
</tr>
<tr>
<td>45</td>
<td>Andy Gheorghiu Consulting</td>
<td>Germany</td>
</tr>
<tr>
<td>46</td>
<td>Clean Cities Campaign Poland</td>
<td>Poland</td>
</tr>
<tr>
<td>47</td>
<td>Nordic Ukraine Forum</td>
<td>Sweden</td>
</tr>
<tr>
<td>48</td>
<td>EUROPEUM Institute for European Policy</td>
<td>Czech Republic</td>
</tr>
<tr>
<td>49</td>
<td>Formando Rutas</td>
<td>Germany</td>
</tr>
<tr>
<td>50</td>
<td>FPPE</td>
<td>Poland</td>
</tr>
<tr>
<td>51</td>
<td>Center for the Study of Democracy</td>
<td>Bulgaria</td>
</tr>
<tr>
<td>52</td>
<td>Association “Energy Efficient Cities of Ukraine”</td>
<td>Ukraine</td>
</tr>
<tr>
<td>53</td>
<td>Naturschutzbund Deutschland (NABU) e.V.</td>
<td>Germany</td>
</tr>
<tr>
<td>54</td>
<td>Rainforest Action Network</td>
<td>USA</td>
</tr>
<tr>
<td>55</td>
<td>Uppsala University</td>
<td>Sweden</td>
</tr>
<tr>
<td>56</td>
<td>Institute for Economic Research and Policy Consulting</td>
<td>Ukraine</td>
</tr>
<tr>
<td>57</td>
<td>Eco Bucha</td>
<td>Ukraine</td>
</tr>
<tr>
<td>58</td>
<td>Deutsche Umwelthilfe e.V.</td>
<td>Germany</td>
</tr>
<tr>
<td>59</td>
<td>CEE Bankwatch Network</td>
<td>Romania</td>
</tr>
<tr>
<td>60</td>
<td>Instytut Spraw Obywatelskich</td>
<td>Poland</td>
</tr>
</tbody>
</table>
61. Center for international cooperation and project implementation  Ukraine
62. 350.org  France
63. Kyiv Municipal League of Public Organizations of People with Disabilities  Ukraine
64. National Ecological Center of Ukraine  Ukraine
65. Center for International Environmental Law  France
66. Ecosense, NGO  Ukraine
67. U-Cycle (NGO Kyiv Cyclists' Association)  Ukraine
68. Earth Action, Inc.  USA
69. Aid Organization  Bangladesh
70. Net Impact The Gambia  Gambia
71. Agency for sustainable development of the Carpathian region "FORZA"  Ukraine
72. Women Engage for a Common Future - WECF  Netherlands
73. Africa Bureau For Climate stories-ABOS  Kenya
74. TRAFFED-RDC AMIS D'AROCHA  DRC
75. Asociacion Con Ucrania  Spain
76. Climate Action Campaign, Humboldt Unitarian Universalist Fellowship  USA
77. Adarsha Samajik Progoti Sangstha  Bangladesh
78. Green 13  Canada
79. Associazione Cristiana degli Ucraini in Italia  Italy
80. Rozviy, Youth Climate Initiative  Ukraine
81. Minerva Ventures  USA
82. NGO "Green World"  Ukraine
83. UWEC Work Group  Georgia
84. Gower Street  United Kingdom
85. GDU Project Helmholtz Center Berlin  Germany
86. VCS Verkehrsr-Club der Schweiz  Switzerland
87. NGO Plato  Ukraine
88. Chaloupky o.p.s.  Czech Republic
89. Just Finance International  Europe
90. Promote Ukraine  Belgium
91. Bellona Europa  Belgium
92. Estonian Green Movement  Estonia
93. Social Justice Committee, St. Andrew's United Church of Canada, Halifax. Canada
94. Grandmothers Act to Save the Planet (GASP)  Canada
95. The Secretariat of the Steering Committee of the Eastern Partnership Civil Society Forum  Belgium
96. 198 methods  USA
97. Global Witness  United Kingdom
98. Atlantic Energy  United Kingdom
100. Canopea  Belgium
101. Limity jsme my  Czech republic
102. Earthsight  United Kingdom
103. Businesses for a Livable Climate  USA
104. Call to Action Colorado  USA
105. CatholicNetwork US  USA
106. Colorado Businesses for a Livable Climate  USA
107. Community for Sustainable Energy  USA
108. Greater New Orleans Housing Alliance  USA
109. Green House Connection Center  USA
110. Indivisible Ambassadors  USA
111. Interstate 70 Citizens Advisory Group  USA
112. Larimer Alliance for Health, Safety, & Environment  USA
113. Littleton Business Alliance  USA
114. Mayfair Park Neighborhood Association  USA
115. Mental Health & Inclusion Ministries  USA
116. Mind's Eye Productions  USA
117. Montbello Neighborhood Improvement Association  USA
118. North Range Concerned Citizens  USA
119. Our Sacred Earth  USA
120. RapidShift Network  USA
121. Save the Environmental Protection Agency  USA
122. Small Business Alliance  USA
123. Southwest Organization for Sustainability  USA
124. Spirit of the Sun  USA
125. System Change Not Climate Change  USA
126. Texas Campaign for the Environment  USA
127. Unite North Metro Denver  USA
128. Wall of Women  USA
129. Western Slope Businesses for a Livable Climate  USA
130. Womxn from the Mountain  USA
131. Working for Racial Equity  USA
132. Climate Risk Horizons  India
133. ZERO – Association for the Earth System Sustainability  Portugal
134. Association of Ethical Shareholders  Germany
135. Ukrainian Network of Integrity and Compliance (UNIC)  Ukraine
136. NGO "Unique Planet"  Ukraine
137. NGO Green Liberty  Ukraine
138. NGO SaveDnipro  Ukraine
139. NGO “Office for the Environment”  Ukraine
140. NGO "Green Generation"  Ukraine
141-230. Business for Ukraine Coalition, on behalf of 89 international and Ukrainian members
231-241. Energy Transition Coalition, uniting 10 Ukrainian organizations.
242-280+. RISE Ukraine Coalition, uniting more than 50 organizations.