The Commission is in close contact with Member States and companies to ensure that payments for gas happen without violation of EU sanctions. For this purpose, the Commission has also issued guidance to Member States and companies on 21 April 2022.\(^1\)

The Commission is aware that several EU companies have chosen to make payments for gas using a Gazprombank account. As set out in the Commission’s guidance, paying for gas on a Gazprom account ‘in the same manner as before the adoption of the Decree, i.e. by depositing the due amount in Euros or Dollars’, does not as such constitute a breach of EU sanctions.

Full and effective enforcement of EU sanctions is the Commission’s priority. The sixth sanctions package has introduced new provisions to ensure that Member States can effectively enforce any breach of sanctions by requiring them to establish criminal penalties for sanctions breaches. At the beginning of March, the Commission established the Freeze and Seize Task Force to further enhance the implementation of sanctions and step up the coordination at Union level. To close any possible gap in the enforcement of sanctions across EU Member States, on 25 May the Commission issued a proposal for a Council Decision to extend the list of EU crimes in Article 83(1) of the Treaty on the Functioning of the European Union so as to include the violation of Union restrictive measures among the areas of crime listed therein. The Commission is committed to immediately proposing a directive to harmonise the definition of such criminal offence and the criminal penalties thereof, following the adoption of the Council Decision.