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GENERAL ARTICLES

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Navigating Policy and Practice: EU Cultural Sanctions in Response to Russia's War against Ukraine

Abstract: Russia's full-scale invasion of Ukraine in February 2022 triggered a major shift in the EU's external policy. The scope and brutality of the aggression, as well as the systemic looting and destruction of Ukraine's cultural heritage, prompted a paradigm shift in the EU's approach to international cultural relations. For the first time, cultural issues were addressed through EU sanctions adopted under the Common Foreign and Security Policy. Between 2022 and 2025, several sanctions packages introduced restrictive measures targeting three key areas related to culture: individual sanctions on Russian oligarchs – art collectors, restrictions on trade in cultural goods, and efforts to prevent the illicit export of Ukrainian heritage. The EU's restrictive measures include sanctions against the Russian officials responsible for cultural appropriation and a museum involved in appropriating Ukrainian heritage in occupied Crimea.

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Drawing on case studies and open-source investigations, the study examines the application of these sanctions and reflects on their emerging impact. While the freezing of assets (works of art) belonging to sanctioned oligarchs has proven difficult to enforce due to legal loopholes and opaque ownership structures, the trade sanctions have begun to limit Russian influence within the European art sector. The European art market has had to adjust to the absence of wealthy Russian clientele, and museum institutions have also reacted to the loss of Russian patrons. The economic and transport sanctions put a halt to European museums' cooperation with their Russian partners, including inter-museum loans. The ban on trade in Ukrainian cultural goods of unclear provenance, in turn, was an important step for the EU in developing systemic solutions to help safeguard Ukraine's cultural heritage. It also reinforced the Union's mechanisms for combating the illicit trade in cultural property. Its effectiveness will rely on sustained legal development, international cooperation, and consistent application across Member States.

Keywords: EU sanctions, Russia's war against Ukraine, illicit trafficking of cultural property, EU foreign policy, international cultural relations, protection of Ukrainian heritage, luxury goods ban on Russia

Introduction

The Russian Federation's invasion of Ukraine and the ensuing full-scale war since 24 February 2022 marked a critical turning point in the configuration of Europe's security and constitute a multidimensional challenge to international relations. The ongoing war has affected and continues to affect the policies of the European Union (EU) and its Member States across every dimension. Moreover, the conflict has had a considerable influence on international cultural relations, cultural life in Europe, and the functioning of art markets both within and beyond Europe. The war has profoundly affected both the bilateral cultural relations between EU Member States and the Russian Federation and the institutional frameworks of EU–Russia cultural cooperation, which have since been suspended. Since 2022, the prevailing model of cultural diplomacy, which continued to permit and even foster cooperation with Russia despite the annexation of Crimea in 2014, was fundamentally challenged.[1]

The scale and brutality of Russian aggression, coupled with the systemic destruction of Ukraine's cultural heritage, led to a paradigm shift whereby culture,

[1] B. Ociepka, J. Arendarska, *Cultural Diplomacy and Sanctions as Foreign Policy Instruments during a Time of Conflict*, "International Affairs" 2023, Vol. 76(3/4), pp. 128-155.

previously exempt from the logic of sanctions, was incorporated into the EU's broader sanctions regime. As a consequence of the war, the European Union and its Member States formally imposed a set of restrictive measures related to culture. The EU imposed trade sanctions on the Russian luxury goods market, which included works of art and antiques. The EU placed on its sanctions list Russian oligarchs associated with Putin's regime, many of whom had long been active players in the European art market and had acquired significant art collections. The EU targeted Russian media and institutions involved in the promotion of Russian culture and language, which are viewed as instruments of pro-Kremlin propaganda.[2] The EU has also adopted restrictive measures against the illegal trafficking of cultural property from Ukraine in order to protect Ukrainian cultural heritage from looting.

The article provides a comprehensive discussion of the scope of the cultural sanctions that the EU introduced against Russia between 2022 and 2025 in response to Russia's aggression against Ukraine. To this end, it outlines the legal basis and the procedure for imposing these sanctions, as well as their practical effects. The aim of this article is not only to examine in detail the EU's sanctions in the area of culture and the art market, but also to undertake a preliminary assessment of their effectiveness as a tool for pressurising Russian elites who support the war and protecting cultural property in times of armed conflict.

Sanctions as an Instrument of the European Union's Common Foreign and Security Policy

Sanctions are restrictive measures used by states or international organizations to address violations of international law and threats to peace and security and to coerce targeted actors into changing harmful behaviour. These measures can affect states, non-state actors, organizations, legal persons, groups, and individuals, and they may take the form of financial, economic, travel-related, or diplomatic restrictions.[3]

The European Union is an important international actor capable of imposing a complex array of sanctions within its foreign policy, ranging from diplomatic measures to so-called "smart" or targeted sanctions. In cases where restrictive measures are imposed by the United Nations Security Council, the EU either automatically incorporates them into EU law or strengthens them through a hybrid mechanism. The EU may also independently impose autonomous restrictive measures.

[2] The EU has placed on its sanctions list 27 Kremlin-backed disinformation outlets and three such organizations: the Russkiy Mir Foundation, the Alexander Gorchakov Public Diplomacy Fund, and Rossotrudnichestvo.

[3] J. Ćwiek-Karpowicz, S. Secrieru (eds.), *Sankcje i Rosja* [Sanctions and Russia], Polski Instytut Spraw Międzynarodowych, Warszawa 2015, pp. 15-19.

The legal basis for the EU's autonomous sanctions lies in Article 29 of the Treaty on European Union (TEU)[4] and Article 215 of the Treaty on the Functioning of the European Union (TFEU),[5] in accordance with the objectives defined in Article 21 TEU.[6] These instruments are deployed in support of the objectives and tasks set out in the Common Foreign and Security Policy (CFSP).

EU sanctions may be imposed on third countries, governments, organizations such as terrorist groups, or individuals responsible for serious violations such as terrorism or human rights abuses.[7] They can include diplomatic measures such as the suspension of bilateral relations, targeted sanctions such as asset freezes, entry bans, or sectoral restrictions. Sectoral sanctions encompass economic, financial, and trade-related measures, the target of which may be trade with a particular country or territory – including export and import bans – restrictions on investments, capital transfers, revocation of tariff preferences, transport bans (covering land, sea, and air transport), prohibitions against financing or providing financial services, restrictions on access to funding sources, and bans on the provision of certain services (e.g. brokerage, financial services, or technical assistance). These restrictive measures are enacted through Council Decisions, taken unanimously within the CFSP framework, and complemented, where necessary, with Council Regulations adopted by a qualified majority when the sanctions involve individuals and entities or financial and economic relations. The Regulation is binding in its entirety on all persons and entities in the EU. Both acts are adopted simultaneously and enter into force upon publication in the Official Journal of the EU. Sanctions are adopted for a limited duration and are regularly reviewed, extended, or amended as needed. Sanctioned individuals and entities retain the right to appeal their designation before the Court of Justice of the European Union.

According to public data from the European External Action Service (EEAS), the EU maintains 40 country-specific sanctions regimes and four thematic ones, covering terrorism, human rights violations, cyberattacks, and the proliferation of weapons. As of November 2025, European Commission data indicate that the EU has sanctioned approximately 5,742 individuals and entities worldwide.[8] Since February 2022, in response to the full-scale invasion of Ukraine, Russia has become the single most heavily sanctioned country within the EU framework, subject to multiple overlapping sanctions regimes.

[4] OJ C 202, 07.06.2016, p. 13 (consolidated version).

[5] OJ C 202, 07.06.2016, p. 47 (consolidated version).

[6] A. Cieśliński, *System unijnych sankcji celowych w związku z agresją Rosji przeciwko Ukrainie* [The System of EU Targeted Sanctions in Response to Russian Aggression Against Ukraine], "Przegląd Sądowy" 2022, Vol. 9, pp. 41-47.

[7] European Council, Council of the European Union, *Types of Sanctions the EU Adopts*, https://www.consilium.europa.eu/en/policies/sanctions-different-types/ [accessed: 20.06.2025].

[8] European Commission, *EU Sanctions Tracker*, https://data.europa.eu/apps/eusanctionstracker/ [accessed: 02.11.2025].

Between Restrictive Measures and Cultural Dialogue: The EU's Approach to Russia, 2014-2022

The Russian Federation's aggression against Ukraine has unfolded in two phases: the 2014 annexation of Crimea and the destabilization of eastern Ukraine, followed by the full-scale invasion launched on 24 February 2022. The EU imposed its first restrictive measures against Russia in 2014 due to the illegal annexation of Crimea in March 2014 and Russia's support for the military and political activities of pro-Russian separatists in the Donetsk and Luhansk regions, which had a destabilizing effect on eastern Ukraine. Diplomatic sanctions included the cancellation of the EU–Russia summit and the suspension of bilateral negotiations on the visa regime. Russia was excluded from the G8, and the planned G8 Summit in Sochi was cancelled.

In March 2014, the EU adopted sanctions targeting 21 individuals held responsible for actions undermining or threatening the territorial integrity, sovereignty, and independence of Ukraine (Council Decision 2014/145/CFSP and Council Regulation (EU) 269/2014)[9] and introduced restrictions on economic relations with Crimea and Sevastopol. Following the downing of flight MH17 over Donbas and the escalation of the armed conflict in July and September 2014, the EU decided to impose the first economic sanctions on trade with Russia and targeted sanctions in the areas of finance, energy, the arms industry, and access to modern technology (Council Decision 2014/512/CFSP and Council Regulation (EU) No. 833/2014).[10] Since March 2015, these sanctions have constituted the EU's main instrument of pressure. They are subject to regular review and are contingent on the implementation of the Minsk agreements. Since those agreements were never fulfilled and the conflict only escalated, the EU continued to extend and expand both individual and economic sanctions between 2015 and 2022.

Parallel to the logic of sanctions, the EU continued to pursue a policy of dialogue with Russia, still regarding it as an important economic partner and a key actor in addressing global challenges and conflicts. Culture and cultural relations in particular, were excluded from the EU's restrictive measures towards Russia after 2014, as the EU has seen this area as an important platform for dialogue and communication with both the Russian authorities and Russian society.[11]

[9] Council Decision 2014/145/CFSP of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 78, 17.03.2014, p. 16; Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 78, 17.03.2014, p. 6.

[10] Council Decision 2014/512/CFSP of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 229, 31.07.2014, p. 13; Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 229, 31.07.2014, p. 1.

[11] B. Ociepka, J. Arendarska, op. cit.

In its June 2015 resolution, the European Parliament emphasized the importance of maintaining relations with Russia, highlighting people-to-people contacts, Erasmus Plus exchanges, and scientific cooperation as key areas.[12] In March 2016, the EU Foreign Affairs Council, together with the High Representative of the Union for Foreign and Security Policy, Federica Mogherini, adopted five principles for EU–Russia relations, including the full implementation of the Minsk agreements, closer ties with Russia's former Soviet neighbours, strengthening EU resilience to Russian threats, selective engagement with Russia on certain issues such as counter-terrorism, and support for people-to-people contacts.[13] This last principle formed the basis for further cooperation in education and research (the programmes Erasmus Plus and Horizon 2020), cooperation with NGOs, and culture, though it was not explicitly mentioned.

Issues concerning the role of culture and cultural cooperation as an important element of international relations were addressed in the first-ever EU strategy on international cultural relations. The Joint Communication titled *Towards an EU Strategy for International Cultural Relations*, announced on 8 June 2016 by Federica Mogherini, High Representative/Vice-President of the Commission, and Tibor Navracsics, the EU Commissioner for Education, Culture, Youth and Sport,[14] became the main reference point for culture-related activities in the EU's external relations and the policies implemented in this area. Although the document did not explicitly refer to EU–Russia cultural relations, it did create an overall framework for such cooperation based on specific instruments and programmes.[15]

That same month, Mogherini announced the EU Strategy for European Foreign and Security Policy, titled *Shared Vision, Common Action: A Stronger Europe*,[16] which identified relations with Russia as a strategic challenge for the Union. The strategy again identified areas for selective EU engagement with Russia, including education, research, and cross-border cooperation, as well as deepening societal ties by facilitating travel for students, civil society, and business.[17] Given that the document – for the first time in the history of the EU's foreign and security policy strategies – explicitly acknowledged the role of culture as a field of

[12] European Parliament resolution of 10 June 2015 on EU-Russia relations (2015/2001(INI)), OJ C 407, 04.11.2016, p. 35.

[13] Council of the European Union, *Outcome of the Council Meeting, 3457th Council Meeting, Foreign Affairs*, 14 March 2016, 7042/16.

[14] European Commission, *Joint Communication to the European Parliament and the Council: Towards an EU Strategy for International Cultural Relations*, 8 June 2016, JOIN(2016) 29 final.

[15] After a year-long procedure, the strategy presented in the Communication was adopted by the Member States in Council conclusions on an EU strategic approach to international cultural relations, OJ C 189, 15.06.2017, p. 38.

[16] European External Action Service, *Shared Vision, Common Action: A Stronger Europe. A Global Strategy for the European Union's Foreign and Security Policy*, Publications Office, 2016.

[17] Ibidem, p. 33.

EU's external relations and identified cultural diplomacy as a new instrument of EU foreign policy, it may be concluded that in 2016 the EU was committed to sustaining and developing cultural relations with Russia, even as further restrictive measures were being adopted.[18]

In subsequent years, the EU developed a detailed policy framework for its engagement in the field of culture and cultural heritage within the framework of the CFSP, shaped by rapidly evolving geopolitical conditions. In April 2021, the EEAS published a document titled *Concept on Cultural Heritage in Conflicts and Crises: A Component for Peace and Security in European Union's External Action*,[19] which set out the principles and operational framework for the EU's systemic engagement in the protection and enhancement of cultural heritage in conflicts and crises. In June 2021, the approach proposed by the EEAS was incorporated into the *Council Conclusions on EU Approach to Cultural Heritage in Conflicts and Crises* (Council Conclusions 9837/21).[20] The EU placed particular emphasis on making cultural heritage protection a priority area of its external action, which was subsequently reflected in Josep Borrell's announcement in November 2021 of *A Strategic Compass for Security and Defence*,[21] which included a reference to the continued protection of cultural heritage, also in the context of the Common Security and Defence Policy missions and operations.

The EU's adoption of the above strategic framework, shortly before Russia's invasion of Ukraine in 2022, was of considerable significance, as it enabled the Union to immediately activate assistance mechanisms aimed at rescuing and safeguarding Ukraine's endangered cultural heritage. These mechanisms were examined in detail, inter alia, in the article *Cultural Heritage as a Field for EU's Action in External Relations: The Evolution of Strategy and the Ukrainian Check*, published in 2024.[22]

It should be recalled at this point that the EU, according to Article 167 TFEU, has limited competence to act in the area of culture, as it is excluded from the harmonization of law, and the EU's cultural policy is only complementary to and supportive of the actions of the Member States. This means that following Russia's

[18] D. Valenza, *A Crisis or a Turning Point? EU Cultural Relations with Russia after Crimea*, in: F. Bossuyt, P. van Elsuwege (eds.), *Principled Pragmatism in Practice: The EU's Policy towards Russia after Crimea*, Brill, Leiden 2021, pp. 332-351.

[19] European External Action Service, *Concept on Cultural Heritage in Conflicts and Crises: A Component for Peace and Security in European Union's External Action*, 19 April 2021, 9962/21.

[20] Council of the European Union, *Council Conclusions on EU Approach to Cultural Heritage in Conflicts and Crises*, 21 June 2021, 9837/21.

[21] European External Action Service, *A Strategic Compass for Security and Defence: For a European Union that Protects Its Citizens, Values and Interests and Contributes to International Peace and Security*, https://www.eeas.europa.eu/sites/default/files/documents/strategic_compass_en3_web.pdf [accessed: 20.05.2025].

[22] D. Jurkiewicz-Eckert, *Cultural Heritage as a Field for EU's Action in External Relations: The Evolution of Strategy and the Ukrainian Check*, "Stosunki Międzynarodowe – International Relations" 2024, Vol. 4/15, https://doi.org/10.12688/stomiedintrelat.17895.1.

2014 annexation of Crimea, cultural diplomacy and bilateral cultural relations with Russia were primarily up to the Member States.[23] The dynamics of these relations between 2014 and 2022 has varied for different EU Member States, resulting in decisions to cancel or organize official cultural seasons in Russia, to develop or freeze the activities of national cultural institutes in Russia, or – as in the case of France – to establish a new format for bilateral cooperation with Russia, i.e. "The Trianon Dialogue" launched by Emmanuel Macron and Vladimir Putin in 2017.

War, Sanctions, and the Collapse of EU–Russia Cultural Cooperation, 2022-2025

A fundamental shift in EU–Russia cultural relations and in the bilateral relations of the Member States with Russia occurred following the second phase of Russia's war against Ukraine, which began with the invasion on 24 February 2022. The European Union has responded to Russia's full-scale war by successively adopting sanctions from 2014, with a total of 19 packages now in force.[24] The core objective of these restrictive measures has been to significantly reduce Russia's financial capacity to wage war, weaken its economy, lower its GDP, deprive it of key technologies and markets, and disrupt the functioning of the Russian elite and individuals affiliated with the Kremlin's political and military regime.[25] These measures were expanded in terms of both the individuals and entities added to the EU's sanctions list since 2014 and the targeted economic sanctions impacting trade, energy, transport, finance, and media.[26]

The full-scale war, which has been ongoing since that day, has triggered multi-level effects in the area of culture and the arts in Europe, as well as the organization of cultural life. In this broader context, EU sanctions have expanded into the areas of cultural cooperation, the trade in cultural goods, and the protection of Ukrainian cultural heritage. They entail asset freezes on works of art, travel bans, restrictive measures concerning EU–Russia trade in cultural goods, and provisions for the protection of Ukrainian cultural heritage. The cultural sanctions follow the structure of the EU sanctions[27] and can be divided into categories,

[23] B. Ociepka, *Cosmopolitan, Promotional or Propagandistic? Cultural Diplomacy at a Time of War*, "Studia Europejskie – Studies in European Affairs" 2025, Vol. 29(3), pp. 23-36.

[24] European Council, Council of the European Union, *EU Sanctions against Russia*, https://www.consilium.europa.eu/en/policies/sanctions-against-russia/ [accessed: 27.10.2025].

[25] A. Hofer, *The EU's 'Massive and Targeted' Sanctions in Response to Russian Aggression, a Contradiction in Terms*, "Cambridge Yearbook of European Legal Studies" 2023, Vol. 25, pp. 19-39.

[26] A. Ciupiński, A. Seń, *Sankcje Unii Europejskiej wobec Rosji jako pomoc dla walczącej Ukrainy 2014-2023* [European Union Sanctions against Russia as Aid for the Fighting Ukraine 2014-2023], "Res Politicae" 2023, Vol. 15, pp. 57-71.

[27] E. Kaca, *Sankcje UE wobec Rosji – wyzwania i konsekwencje dla przyszłości polityki sankcyjnej* [EU Sanctions against Russia – Challenges and Consequences for the Future of Sanctions Policy], in: J. Szymańska (ed.),

which are discussed further in the article: EU sanctions against individuals and entities, EU trade sanctions, and EU sanctions in support of protecting Ukrainian heritage. The first two categories are targeted against Russia, whereas the third constitutes a positive measure stemming from the EU's systemic commitment to supporting Ukraine in the protection and preservation of its cultural heritage, which, as a result of the war, has been exposed to destruction, theft, and illicit trade and export.

EU Sanctions and the Freezing of Works of Art as an Instrument of Pressure on Russian Oligarchs

According to data available on the European Commission's website, from the outbreak of Russia's full-scale war with Ukraine in 2022 until 2 November 2025, 2,598 individuals and entities related to the Russian Federation have been subjected to the EU sanctions,[28] and the value of frozen private assets in the EU currently stands at more than €28 billion.[29] According to European Commission data, 998 citizens of the Russian Federation have been covered by the restrictive measures, which now represents 17.1% of all individuals sanctioned by the EU.[30]

This group includes oligarchs and businessmen, some of whom have amassed significant art collections. Over the years, many of them have established themselves as major players in European art markets, building their reputations as generous patrons and board members of prestigious cultural institutions (museums and foundations) across Europe and the United States.[31] According to the *Art & Finance Report 2019* by Deloitte and ArtTactic, Russian collectors were reportedly spending between US$1.0 and 1.5 billion annually on European and American artworks in the international art market (auctions, fairs, galleries, and other transactions).[32]

Due to the opaque nature of the art market, the complicated nature of the transactions taking place, and the lack of systems that would collect reliable data on the size and value of the art collections amassed by Russian oligarchs and busi-

Unia Europejska wobec rosyjskiej agresji na Ukrainę [The European Union and Russian Aggression in Ukraine], Polski Instytut Spraw Międzynarodowych, Warszawa 2024, pp. 49-62.

28 European Commission, *EU Sanctions Tracker…* Data as of 2 November 2025.

29 European Commission, *Sanctions against Individuals, Companies and Organisations*, https://commission.europa.eu/topics/eu-solidarity-ukraine/eu-sanctions-against-russia-following-invasion-ukraine/sanctions-against-individuals-companies-and-organisations_en [accessed: 02.11.2025].

30 European Commission, *EU Sanctions Tracker…* Data as of 2 November 2025.

31 A. Savitskaya, *The Rise and Fall of Russian Collectors and Patrons*, "Art Focus Now", 5 April 2023, https://artfocusnow.com/discoveries/the-rise-and-fall-of-russian-collectors-and-patrons/ [accessed: 20.05.2025].

32 Deloitte, ArtTactic, *Art and Finance Report 2019*, 6th edition, p. 240, https://downloads.ctfassets.net/u7fuap5iqsvx/7wTfLwlHW5L9H3JJXJHU6j/3b902c69fd619f77ac81434bdddd1898/lu-art-and-finance-report-2019.pdf [accessed: 20.05.2025].

nessmen, it is impossible to provide authoritative figures on this subject. Prior to the outbreak of the war, various media covered high-profile auction acquisitions. Following the 2022 invasion, the press coverage shifted to ownership disclosures and headlines about the frozen assets of sanctioned oligarchs. The journalistic investigations have revealed financial flows, changes in ownership structures, and the circumvention of sanctions.[33]

One of the most informative sources on artworks owned by Russian oligarchs under individual sanctions by various sanctions regimes (Ukraine, the USA, the European Union, the United Kingdom, Switzerland, Poland, Canada, Japan, Australia, and New Zealand) in relation to their involvement in supporting Russia's war against Ukraine proved to be the "War and Art" portal, created in August 2023 by Ukraine's National Agency on Corruption Prevention (NACP).[34] This was a portal and specialized database launched by the NACP as part of the "War and the Sanctions" database portal, which has been in operation since February 2022, and which collected and made available detailed data of individuals linked in various ways to the war in Ukraine, who either have been inscribed on at least one of the sanctions lists since 2014 or whom the NACP has recommended for sanctions due to links and support for Russia's actions against Ukraine. The data was gathered from 248 open sources.

Before the platform was taken offline on 22 March 2024, the NACP had compiled records on 10,691 sanctioned individuals and 23,682 individuals recommended for sanctions.[35] The "War and Art" section listed artworks and cultural objects belonging to those individuals or their close associates. At its launch, it catalogued 300 works of an estimated value of US$1.3 billion.[36] After less than a year, that number had increased significantly. According to data published by Madison Leeson and colleagues in the article *War, Art and Sanctions: Social Network Analysis on the NACP's Databases of Sanctioned Individuals and Art Collectors*, there were 1,948 objects registered and described in the NACP's "War and Art" database as of 12 February 2024.[37] The authors cross-referenced this data with the sanc-

[33] See e.g. W. Fitzgibbon, H. Boland-Rudder, *Artful Dodgers: US Senate Finds Billionaire Putin Pals Evaded Sanctions through Art Deals*, "International Consortium of Investigative Journalists", 30 July 2020, https://www.icij.org/investigations/panama-papers/artful-dodgers-us-senate-finds-billionaire-putin-pals-evaded-sanctions-through-art-deals/ [accessed: 20.05.2025].

[34] National Agency on Corruption Prevention (NACP), *War and Art: The NACP Has Launched a New Section on the 'War and Sanctions' Portal regarding the Policy of Integrity in the Art Sphere*, 3 August 2023, https://nazk.gov.ua/en/news/war-and-art-the-nacp-has-launched-a-new-section-on-the-war-and-sanctions-portal-regarding-the-policy-of-integrity-in-the-art-sphere/ [accessed: 20.05.2025].

[35] M. Leeson et al., *War, Art and Sanctions: Social Network Analysis on the NACP's Databases of Sanctioned Individuals and Art Collectors*, "International Journal of Digital Humanities" 2024, Vol. 6, p. 190.

[36] D. Boffey, *Ukraine Creates Database of Art Linked to Sanctions-Hit Russians*, "The Guardian", 8 August 2023, https://www.theguardian.com/world/2023/aug/08/ukraine-creates-database-of-art-linked-to-sanctions-hit-russians [accessed: 20.05.2025].

[37] M. Leeson et al., op. cit., p. 192.

tioned individuals listed in the "War and Sanctions" registry and identified a group of seven Russian oligarchs – art collectors under EU sanctions: Petr Aven, Roman Abramovich, Viatcheslav Kantor,[38] Oleg Deripaska, Andrey Melnichenko, Mikhail Fridman, and Arkady Rotenberg.[39] As a result of the methodology employed, the authors also succeeded in collecting detailed data on the volume of artworks and cultural assets these individuals had accumulated.

Following the outbreak of the full-scale war and the imposition of sanctions by the EU, the United States, the United Kingdom, and other states (including Switzerland, Japan, and New Zealand), numerous media reports have documented the freezing – and, in some cases, the seizure – of luxury assets owned by sanctioned individuals, with only a limited number of cases specifically involving artworks.[40] However, most of the focus was not on the few works that were frozen or even seized, but rather on those that were not frozen due to sanctions. Instances of effective circumvention or violation of the sanctions also drew attention, notably in the case of Arkady Rotenberg, who breached US sanctions in 2014, or Roman Abramovich, who reportedly owned one of the world's most valuable private collections of 20th- and 21st-century art. Through legal restructuring conducted before the February 2022 invasion, Abramovich ensured that his collection could not be subjected to an asset freeze, even though he was later added to the sanctions list.[41]

Within the EU's framework of restrictive measures since February 2022, only a few publicly known cases involve artworks that are part of asset freezes targeting sanctioned Russian oligarchs. Three well-documented examples illustrate the application of asset-freezing mechanisms – and, in one case, seizure – by Member States within the EU sanctions regime following Russia's full-scale invasion.

The first case concerns three paintings presented at the exhibition *La Collection Morozov. Icônes de l'art moderne* (The Morozov Collection: Icons of Modern Art) hosted at the Fondation Louis Vuitton in Paris. Two of the paintings were frozen under the EU's individual sanctions, while the third was retained under a bilat-

[38] Viatcheslav Moshe Kantor was added to the EU sanctions list on 8 April 2022 by Council Decision (CFSP) 2022/582, OJ L 110, 08.04.2022, p. 55, and Council Implementing Regulation (EU) 2022/581, OJ L 110, 08.04.2022, p. 3, no. 896. He was deleted from the EU sanctions list on 15 March 2025, under Council Implementing Regulation (EU) 2025/527, OJ L, 15.03.2025, annex, p. 2.

[39] M. Leeson et al., op. cit., p. 206.

[40] According to data reported by EU Member States to the "Freeze and Seize Task Force" and published on 8 April 2022, the value of frozen Russian assets amounted to €29.5 billion, including in assets such as yachts, helicopters, real estate, and works of art worth €6.7 billion: European Commission, *'Freeze and Seize Task Force': Almost €30 Billion of Assets of Russian and Belarussian Oligarchs and Entities Frozen by the EU So Far*, 8 April 2022, https://enlargement.ec.europa.eu/news/freeze-and-seize-task-force-almost-eu30-billion-assets-russian-and-belarussian-oligarchs-and-2022-04-08_en [accessed: 20.06.2025].

[41] R. Davies, J. Jones, *'You Could Fill a Museum with It': The $963m Roman Abramovich Art Collection Revealed*, "The Guardian", 22 September 2023, https://www.theguardian.com/world/ng-interactive/2023/sep/22/roman-abramovich-art-collection-dasha-zhukova [accessed: 20.05.2025].

eral diplomatic agreement between France and Ukraine.[42] The exhibition, inaugurated in September 2021 in the presence of French President Emmanuel Macron, was originally scheduled to close on 22 February 2022, but its run was extended to 6 April 2022. Featuring over 200 masterpieces from the collection of Ivan and Mikhail Morozov, it became one of the most significant cultural events in Europe during the 2021-2022 season, attracting over 1.2 million visitors. The collection, shown in its entirety for the first time since 1918, included works by Manet, Monet, Derain, Cézanne, Gauguin, Van Gogh, Pissarro, Renoir, Sisley, Bonnard, Maillol, Rodin, Matisse, Denis, Vlaminck, Marquet, and Russian painters such as Repin, Serov, Goncharova, Malevich, Outkine, Larionov, Konchalovsky, Mashkov, Konenkov, and Saryan.

The outbreak of the war on 24 February 2022 elicited strong reactions among the French public. Given that the majority of the exhibited works originated from Russian state museums (the State Hermitage Museum, the Pushkin State Museum of Fine Arts, and the State Tretyakov Gallery), some demanded that the masterpieces be frozen until the war launched by the Russian aggressor comes to an end. Serious issues also arose in connection with the EU sanctions imposed on the Russian Federation, which directly affected the fate of the artworks loaned to the Paris exhibition. The controversy concerned both the return of the entire collection to Russia in the context of the trade and transport sanctions and the imposition of asset freezes on artworks loaned by oligarchs who were subject to EU sanctions.

Ultimately, on 9 April 2022, the Ministry of Culture of France announced the imposition of an asset freeze on two paintings that had been on display until 6 April 2022 at the Fondation Louis Vuitton. The first was Pyotr Konchalovsky's *Self-Portrait* from 1912, owned by Petr Olegovich Aven, included in the EU sanctions list on 28 February 2022 (Council Implementing Regulation (EU) 2022/336, no. 674).[43] Petr Aven, one of Vladimir Putin's closest associates, had a personal fortune estimated at US$4.7 billion[44] in 2025 and owned an art collection valued at approximately £300 million.[45] He topped the NACP list of sanctioned oligarchs/collectors with 369 identified objects. The second painting was *A Portrait of Timofei Morozov* by Valentin Serov, part of Viatcheslav Kantor's collection and

[42] The third work of art was loaned by the Dnipropetrovsk Art Museum in Ukraine. At the request of the Ukrainian authorities, the painting was to remain in France until the cessation of hostilities.

[43] Council Implementing Regulation (EU) 2022/336 of 28 February 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 58, 28.02.2022, p. 1.

[44] https://petraven.info/ [accessed: 20.05.2025].

[45] M. Bentham, *£300m Art Collector Oligarch Accused of Breaching Sanctions by Selling Luxury Cars*, "The Standard", 13 July 2022, https://www.standard.co.uk/news/uk/petr-aven-art-collector-oligarch-accused-breaching-sanctions-b1012038.html [accessed: 20.05.2025].

formally owned by the Museum of Avant-Garde Mastery, his private foundation.[46] Kantor, whose wealth was estimated at US$12.7 billion[47] in 2022, has been subject to the EU restrictive measures since 8 April 2022 (Council Decision (CFSP) 2022/582 and Council Implementing Regulation (EU) 2022/581, no. 896). Listed among ArtNews' Top 200 Collectors of 2024, he reportedly owned 302 artworks and cultural objects, according to the NACP. Kantor was officially deleted from the EU sanctions list on 15 March 2025, under Council Implementing Regulation (EU) 2025/527, which enabled the French authorities to return the painting.

Another widely reported case occurred in November 2022, when German authorities seized 30 artworks belonging to Alisher Usmanov, a Russian-born oligarch from Uzbekistan who was placed under EU sanctions on 28 February 2022 (Council Implementing Regulation (EU) 2022/336, no. 673). The seized collection, estimated at €5 million, included a painting by Marc Chagall. The pieces had been displayed aboard Usmanov's US$600 million superyacht until 2021, when they were transferred into storage during the yacht's renovation in Hamburg. The artworks were seized in connection with an investigation conducted by the German authorities concerning money laundering, tax evasion, and other violations of international trade law by Usmanov and his companies.[48]

Limited access to open-source data on asset freezes concerning artworks and valuable cultural objects under EU sanctions hinders any reliable assessment of the scale of these measures, though it appears to be very limited. Existing legal mechanisms allow oligarchs linked to the Kremlin to shield their art assets through legal restructuring, anonymous intermediaries, offshore firms, freeports, or illicit exportation to jurisdictions not subject to sanctions. These tactics greatly hamper effective enforcement by EU Member States. This does not mean, however, that the sanctions imposed on the oligarchs were entirely without effect. Although the freezing of artworks in their possession may be regarded as largely ineffective, the sanctions nonetheless had a tangible impact on the presence of Russian oligarchs and their financial resources in the European art market.

The imposition of restrictive measures and the freezing of financial assets belonging to Russian oligarchs, combined with the Fifth Anti-Money Laundering Directive (V AML)[49] – adopted by the EU in 2018 – and the enforcement of other

[46] *Un troisième tableau de la collection Morozov gelé par la France*, "Le Figaro", 23 April 2022, https://www.lefigaro.fr/culture/un-troisieme-tableau-de-la-collection-morozov-gele-par-la-france-20220423 [accessed: 20.05.2025].

[47] *Viatcheslav Moshe Kantor*, "Artnews", https://www.artnews.com/art-collectors/top-200-profiles/viatcheslav-moshe-kantor/ [accessed: 20.05.2025].

[48] F. Aton, *$5 M. Art Collection Seized from Russian Oligarch's Superyacht by German Authorities*, "Artnews", 8 November 2022, https://www.artnews.com/art-news/news/alisher-usmanov-russia-art-collection-seized-1234645939/ [accessed: 20.05.2025].

[49] Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of mon-

sanction regimes (notably those of the UK, the USA, and Switzerland), have significantly curtailed the activity of Russian oligarchs – art collectors in the European art market. This decline has significantly affected auction houses, galleries, intermediaries, and art fairs across Europe, all of which have been forced to adapt to new circumstances and the withdrawal of Russian clientele.

EU Sanctions against Government Officials and Cultural Institutions Responsible for Actions against Culture and Cultural Heritage in Ukraine

Russia's ongoing war against Ukraine, originating in 2014, has had a devastating impact on Ukraine's cultural sector and cultural heritage. In February 2024, the World Bank Group, the Government of Ukraine, the EU, and the UN estimated the damage in this domain at US$3.5 billion, in the report *Third Rapid Damage and Needs Assessment (RDNA3)*.[50] Museum collections and archives, as well as artefacts of historical, anthropological, and artistic significance, have been removed from the occupied territories and taken to Russia, some of which end up in Russian museums and some of which feed the black market in art. Illegal archaeological excavations and invasive construction works have been carried out to deliberately destroy the Ukrainian character of the sites. The attacks, plundering, destruction of Ukrainian cultural heritage, and Russification of the occupied territories have become part of the war being pursued by the Russian Federation.

The systemic and destructive nature of the Russian Federation's actions against both the tangible and intangible cultural heritage of Ukraine involves not only the Russian army, but also a network of individuals, officials, state bodies, and Russian public institutions responsible for implementing this policy. Due to the severity of their actions, the EU decided to subject them to sanctions. By November 2025, six Russian officials had been placed on the EU sanctions list, as well as – for the first time in the history of EU sanctions against Russia – a museum institution.

Following the outbreak of full-scale war, the EU, under the ninth package of restrictive measures dated 16 December 2022 (Council Decision (CFSP) 2022/2477 and Council Implementing Regulation (EU) 2022/2476) imposed financial sanctions

ey laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU, OJ L 156, 19.06.2018, p. 43; W. Szafrański, *Nowe regulacje dotyczące przeciwdziałania praniu pieniędzy w obrocie dziełami sztuki. Między implementacją V AMLD a rozwiązaniem systemowym* [New Regulations to Counteract Money Laundering in the Trading of Works of Art: Between the Implementation of AMLD V and the Systemic Solution], "Santander Art and Culture Law Review" 2021, Vol. 1(7), pp. 61-82.

[50] The World Bank, the Government of Ukraine, the European Union, the United Nations, *UKRAINE: Third Rapid Damage and Needs Assessment (RDNA3) February 2022 – December 2023*, https://ukraine.un.org/sites/default/files/2024-02/UA%20RDNA3%20report%20EN.pdf [accessed: 05.09.2025].

and a travel ban on Olga Lyubimova, Minister of Culture of the Russian Federation. In its explanatory note, the EU clearly stated that her listing directly related to her responsibilities for government-level policies and actions to destroy Ukraine's cultural heritage and Russify the illegally seized territories.[51]

The next two individuals were sanctioned for their involvement in the theft and illegal transfer of museum collections from Kherson to Crimea in 2022. Under the eleventh sanction package, announced on 23 June 2023 (Council Decision (CFSP) 2023/1218 and Council Implementing Regulation (EU) 2023/1216), the EU imposed restrictive measures on two museum directors who had played active roles in the removal of approximately 10,000 artefacts from the Kherson Fine Arts Museum during the Russian occupation of the city in October–November 2022. These artefacts were subsequently transported to and stored in the Central Museum of Taurida in Simferopol, located in illegally occupied Crimea. The individuals concerned are Natalya Desyatova, appointed in July 2022 as the director of the Kherson Fine Arts Museum by the Russian authorities,[52] and Andrei Malgin, director of the Central Museum of Taurida in Simferopol.[53] In cooperation with Interpol and investigative journalists from *The European Correspondent*, Ukrainian authorities compiled and released documentation detailing the theft of artefacts from Kherson museums and identifying their current location, amid growing concerns that these items may find their way into the illicit art trade.[54]

In 2025, the EU added three more individuals and a cultural institution to its sanctions list. As part of the seventeenth package of sanctions, which entered into force on 20 May 2025 (Council Decision (CFSP) 2025/936 and Council Implementing Regulation (EU) 2025/933), Elena Morozova, director of the State Museum-Preserve "Tauric Chersonese" in Sevastopol was added to the list, along-

[51] Council Decision (CFSP) 2022/2477 of 16 December 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 332 I, 16.12.2022, p. 466; Council Implementing Regulation (EU) 2022/2476 of 16 December 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 322 I, 16.12.2022, p. 318. Olga Lyubimova, no. 1323.

[52] In April 2025, Natalya Desyatova was sentenced in absentia to 12 years in prison by the Kherson City Court for collaboration during the Russian occupation of the Kherson region.

[53] Council Decision (CFSP) 2023/1218 of 23 June 2023 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 159 I, 23.06.2023, p. 526; Council Implementing Regulation (EU) 2023/1216 of 23 June 2023 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 159 I, 23.06.2023, p. 335. Natalya Desyatova – no. 1517 and Andrei Malgin – no. 1520.

[54] *They Stole the Past and Betrayed the Future*, "The European Correspondent", https://www.europeancorrespondent.com/russian-art-theft [accessed: 20.05.2025]; S. Kishkovsky, *'These Are Terrible Crimes': A Ukrainian Museum Director's Fight to Recover Art, Interview with Alina Dotsenko*, "The Art Newspaper", 16 July 2024, https://www.theartnewspaper.com/2024/07/16/these-are-terrible-crimes-a-ukrainian-museum-directors-fight-to-recover-art [accessed: 20.05.2025].

side the museum itself.[55] The listing of this museum under the EU sanctions regime constituted the first case of a cultural institution being targeted by the EU's restrictive measures in response to the Russian Federation's war against Ukraine. Inscribed by Ukraine on the UNESCO World Heritage List in 2013 as "The Tauric Chersonese National Reserve", the museum now operates under a new name imposed by Russian authorities. As the State Museum-Preserve "Tauric Chersonese", it has become a symbol of Russia's systematic policy, implemented since 2014, to erase the cultural heritage of Crimea and enforce cultural Russification in the occupied territories. Archaeological excavation, invasive restoration, and research activities carried out at the site since 2015 on the orders of Russian authorities have significantly damaged it. These activities have also impacted the site's heritage value by removing artefacts and transferring them into Russia. Furthermore, the site has been intentionally repurposed to serve the objectives of Russia's revisionist historical narrative and state-sponsored propaganda. The EU has recognized the actions of Elena Morozova and the State Museum-Preserve "Tauric Chersonese" as undermining and threatening the territorial integrity, sovereignty, and independence of Ukraine, and therefore subjected them to sanctions.[56]

In July 2025, as part of the eighteenth package of sanctions, which came into force on 19 July 2025 (Council Decision (CFSP) 2025/1478 and Council Implementing Regulation (EU) 2025/1476), the EU imposed individual restrictive measures on Olga Burova, who supported the illegal annexation of Crimea in 2014 and who, since May 2023, has served as the so-called "First Deputy Minister of Culture of the Republic of Crimea", implementing a policy of promoting Crimea as a centre of Russian culture and as part of Russian history.[57]

[55] Council Decision (CFSP) 2025/936 of 20 May 2025 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 20.05.2025; Council Implementing Regulation (EU) 2025/933 of 20 May 2025 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 20.05.2025. Elena Morozova – no. 1937, the State Museum-Preserve "Tauric Chersonese" – no. 569.

[56] At the request of the UNESCO Secretariat, Ukraine has submitted a detailed note on Russia's systemic actions towards culture and cultural heritage in the occupied territories of Crimea since 2014. See UNESCO, *Follow-Up to Decisions and Resolutions Adopted by the Executive Board and the General Conference at Their Previous Sessions*, 9 September 2022, 215 EX/5.I.E, pp. 4-23. Russia's violation of international law in this area has also been addressed by the European Parliament, inter alia in a thematic note dated April 2022. European Parliament, *Russia's War on Ukraine's Cultural Heritage*, April 2022, https://www.europarl.europa.eu/RegData/etudes/ATAG/2022/729377/EPRS_ATA(2022)729377_EN.pdf [accessed: 20.05.2025].

[57] Council Decision (CFSP) 2025/1478 of 18 July 2025 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 19.07.2025; Council Implementing Regulation (EU) 2025/1476 of 18 July 2025 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 19.07.2025. Olga Burova – no. 1953.

In October 2025, as part of its nineteenth sanctions package which came into force on 23 October 2025 (Council Decision (CSFP) 2025/2036 and Council Implementing Regulation 2025/2035), the European Union added Yulia Velichko, the First Deputy Minister of Culture of the so-called "Luhansk People's Republic", to its sanctions list.[58] The reason was her direct involvement in the manipulation of Ukraine's cultural heritage and responsibility for implementing Russian educational policies concerning Ukrainian children in the illegally occupied territories. The EU officially pointed to these actions as the reason for adding Burova and Velichko to the sanctions list due to their undermining and threatening the territorial integrity, sovereignty, and independence of Ukraine.

EU Sanctions and the Trade in Cultural Goods: The Luxury Goods Export Ban to Russia and Its Impact on the Art Market and Museum Cooperation since March 2022

Following the informal European Council summit in Versailles on 10-11 March 2022, the President of the European Commission, Ursula von der Leyen, announced the introduction of a fourth package of sanctions against Russia. This package included a prohibition on the sale, export, or transfer of luxury goods to the Russian Federation (Council Decision (CFSP) 2022/430 and Council Regulation (EU) 2022/428).[59] In justifying this measure, President von der Leyen stated: "We will ban the export of any EU luxury goods from our countries to Russia, as a direct blow to the Russian elite. Those who sustain Putin's war machine should no longer be able to enjoy their lavish lifestyle while bombs fall on innocent people in Ukraine".[60] The inclusion of luxury goods in the sanctions package was therefore to become another element of economic and normative pressure on the wealthy members of Russian society.

By Council Regulation (EU) 2022/428, the EU introduced, in Article 3h, a prohibition on the trade and transfer of luxury goods to Russia. The scope of this pro-

[58] Council Decision (CFSP) 2025/2036 of 23 October 2025 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 23.10.2025; Council Implementing Regulation (EU) 2025/2035 of 23 October 2025 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 23.10.2025. Yulia Velichko – no. 1968.

[59] Council Decision (CFSP) 2022/430 of 15 March 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 87 I, 15.03.2022, p. 56; Council Regulation (EU) 2022/428 of 15 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 87 I, 15.03.2022, p. 13.

[60] European Commission, *Statement by President von der Leyen on the Fourth Package of Restrictive Measures against Russia*, 11 March 2022, https://ec.europa.eu/commission/presscorner/detail/en/statement_22_1724 [accessed: 20.05.2025].

hibition is further specified in Annex XVIII to the Regulation, which defines the categories of goods covered by these restrictive measures.

> Article 3h
> 1. It shall be prohibited to sell, supply, transfer or export, directly or indirectly, luxury goods as listed in Annex XVIII, to any natural or legal person, entity or body in Russia or for use in Russia.
> 2. The prohibition referred to in paragraph 1 shall apply to luxury goods listed in Annex XVIII insofar as their value exceeds EUR 300 per item unless otherwise specified in the Annex.
> 3. The prohibition referred to in paragraph 1 shall not apply to goods which are necessary for the official purposes of diplomatic or consular missions of Member States or partner countries in Russia or of international organisations enjoying immunities in accordance with international law, or to the personal effects of their staff.[61]

Annex XVIII to the Regulation sets out a list of 22 categories of luxury goods subject to the ban. Category 20 comprises "works of art, collectors' pieces and antiques".[62] The implementation of this ban had significant repercussions for the European art market and for museum institutions that cooperated with Russian counterparts and held works of art and other artefacts on loan for temporary exhibitions, whether ongoing or scheduled to open in Europe when the full-scale war broke out on 24 February 2022.

The low threshold (€300) on artworks and objects permitted for sale, export, and transfer to Russia as of 15 March 2022 – when combined with stricter due diligence obligations under the Fifth Anti-Money Laundering Directive, the exclusion of Russian banks from the SWIFT system, and significant logistical and transport barriers – has substantially severed Russian buyers from the European art market. This disconnection, in turn, has had a tangible impact on the operations of galleries, auction houses, and dealers in art and antiques whose clientele previously included wealthy collectors from the Russian Federation.

Available sources and studies suggest that the UK sanctions (and to a lesser extent, EU restrictive measures) have had an impact on the international market for Russian art – and Russian paintings in particular.[63] As noted by art lawyers Steve Schindler and Katie Wilson-Milne, "dealers or galleries in Russia now lost their ability to do international business, Russian collectors [and] museums have lost their ability to collect".[64] This situation has entailed the withdrawal of Russian galleries

[61] Council Regulation (EU) 2022/428, op. cit., p. 16.

[62] Ibidem, p. 41.

[63] T. Frazer, V. Kleiner, C. Mann, *Shifting Landscapes: Navigating the Russian Paintings Market in the Wake of Geopolitical Tensions*, https://www.overstoneart.com/press-content/russian-art-market-post-2022 [accessed: 20.05.2025].

[64] *Russian Sanctions and the Art Market*, "The Art Law Podcast", 15 July 2022, https://artlawpodcast.com/2022/07/15/russian-sanctions-and-the-art-market/ [accessed: 20.05.2025].

from European art fairs, the disappearance of European galleries from the Russian market, and the suspension of institutional cooperation.

The sanctions have also led to wider consequences. Since 2022, in response to the increasing challenges in trading with Western countries, a domestic art market has started to develop in Russia. Additionally, new dynamics have emerged globally, with countries like the United Arab Emirates and cities such as Dubai, Abu Dhabi, and Sharjah opening to Russian collectors, becoming regional art hubs, and gaining more significance in the global art market.[65]

Furthermore, the ban introduced by the EU and other countries on the export of luxury goods such as works of art, collectors' items, and antiques has set in motion various mechanisms allowing the circumvention of sanctions. These include the use of third-country logistical routes[66] and trading hubs for artworks, the employment of intermediaries or companies based in non-sanctioning jurisdictions, and obfuscation of the identity of the ultimate beneficial owner (UBO), all of which complicate enforcement.

As noted above, the prohibition introduced on 15 March 2022 significantly affected the ability of Russian museums and cultural institutions to purchase artworks, antiques, and similar objects. However, this was not the only consequence of the newly imposed sanctions for Russian museums. Article 3h(3) of Council Regulation (EU) 2022/428, adopted as part of the fourth package of sanctions, did not provide for derogations regarding works of art loaned by Russian state museums for temporary exhibition in Europe and beyond and which remained outside Russia at the outbreak of the war. According to data published by the Ministry of Culture of the Russian Federation, a total of 1,500 works of art and museum artefacts were on temporary exhibition prior to 24 February 2022 in France, Belgium, Italy, Spain, Germany, the United Kingdom, the Netherlands, Serbia, Czechia, Japan, Oman, South Korea, and the United Arab Emirates.[67] The individual value of these works repeatedly exceeded limit specified in Article 3(2).

The outbreak of the full-scale war and the sanctions imposed on Russia thus confronted museums with a series of challenges related to their obligation to ensure the safe return to Russia of loaned works – protected by guarantees of inviolability in accordance with the principle of "immunity from seizure" binding upon the parties – while at the same time being subject in Europe to the EU restrictive

[65] S. Kishkovsky, *Art Trade Benefits as Wealthy Russians Flock to Sanction-Free Dubai*, "The Art Newspaper", 18 January 2023, https://www.theartnewspaper.com/2023/01/18/art-trade-benefits-as-wealthy-russians-flock-to-sanction-free-dubai [accessed: 20.05.2025].

[66] D. Sukharev, Systema, *For Some Russian Art Collectors, Uzbekistan Is How You Avoid Sanctions*, "Radio Free Europe/Radio Liberty", 6 September 2024, https://www.rferl.org/a/russia-art-sanctions-uzbekistan-investigation/33105595.html [accessed: 20.05.2025].

[67] *Vyvoz muzejnyh cennostej iz Rossii na zarubežnye vystavki priostanovlen* [The Removal of Museum Valuables from Russia for Exhibitions Abroad Has Been Suspended], "Interfax", 24 June 2022, https://www.interfax.ru/culture/847713 [accessed: 30.05.2025].

measures imposed on Russia, including the sanctions under Article 3h of Council Regulation (EU) 2022/428 and transport sanctions, which further complicated the secure return of the loaned artworks. The scale of these challenges and the impact of Russia's invasion of Ukraine on international collaboration between Western European museums and Russian state museums, is examined in-depth in an article titled *European Museum Cooperation with Russia amid the Ukraine War: Post-2022 Crisis and Challenges*.[68]

The following two cases demonstrate the direct impact of the EU's economic and transport sanctions on the return of works loaned from Russian museums within the framework of the EU sanctions regime and the ongoing war.

The first case concerns the return to Russia of 167 works loaned by Russian state museums for the high-profile exhibition *La Collection Morozov. Icônes de l'art moderne* at the Fondation Louis Vuitton in Paris. The exhibition, eagerly anticipated by an international audience, was a major museum event and an equally significant element of Russia's cultural offensive during the 2021-2022 artistic season. Inaugurated in September 2021 in the presence of French President Emmanuel Macron, the exhibition was originally scheduled to close on 22 February 2022. Owing to immense public interest, however, it was extended until 6 April 2022, which meant that it continued during Russia's full-scale invasion of Ukraine and prompted public debate regarding the future of the works loaned from Russia.

Under French law, artworks loaned from Russian museums were protected from seizure in accordance with a 1994 statute which guarantees the immunity of cultural objects loaned from foreign institutions for public display in France. In each case, the French government issues a decree listing the protected items, specifying the duration of the loan, and identifying the responsible institution. In the case of this exhibition, three decrees were issued, providing protection through 15 May 2022.[69]

Following the outbreak of war, a series of serious logistical and diplomatic issues arose concerning the return of the artworks. Under the EU sanctions in force since 15 March 2022, which included a ban on the export and transfer of works of art to Russia, the French government, bound by EU law, was required to resolve the matter of returning the valuable collection to Russia at the level of the European Commission and the Council. In the absence of such measures, individual masterpieces, each worth millions of euros, could have been seized by customs authorities entitled to directly apply the sanctions. At the EU level, the matter concerned the correction of the provisions in Article 3h of Council Regulation (EU) 2022/428 in a manner that would allow for the return of the artworks to Russia. Following

[68] D. Jurkiewicz-Eckert, *European Museum Cooperation with Russia amid the Ukraine War: Post-2022 Crisis and Challenges*, "Studia Europejskie – Studies in European Affairs" 2025, Vol. 29(3), pp. 79-118.

[69] Ibidem, p. 96.

lobbying by the French government, this provision was subsequently amended in the fifth sanctions package, which was adopted on 8 April 2022 (Council Decision (CFSP) 2022/578 and Council Regulation (EU) 2022/576).[70] Article 3h was supplemented with two additional paragraphs:

4. By way of derogation from paragraph 1, the competent authorities may authorise the transfer or export to Russia of cultural goods which are on loan in the context of formal cultural cooperation with Russia.
5. The Member State concerned shall inform the other Member States and the Commission of any authorisations granted under paragraph 4 within two weeks of the authorisation.[71]

This solution constituted a derogation from the ban on the export and transfer of luxury goods, provided that such goods were loaned within the framework of institutional cultural cooperation. Following the entry into force of the clarified provisions and after obtaining guarantees for the safe transit of these artworks to Russia via Belgium, Germany, and Finland, 167 works from the exhibition in Paris were transported by trucks to Moscow and St Petersburg (as well as to Belarus) in early May 2022.[72]

The derogations from the ban on the export and transfer of luxury goods introduced in the fifth EU sanctions package also resolved the problem of returning some 30 artworks from five Russian museums that had been detained by Finnish customs under Article 3h of Council Regulation (EU) 2022/428 at the beginning of April 2022.[73] This concerned the return shipment of artworks loaned by Russian museums to exhibitions in Italy and Japan. The return, requested by the Russian side, was carried out during the full-scale war and within the framework of the sanctions imposed on Russia.[74] The value of the transported paintings and sculptures was estimated at €42 million. The Finnish authorities considered the

[70] Council Decision (CFSP) 2022/578 of 8 April 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 111, 08.04.2022, p. 70; Council Regulation (EU) 2022/576 of 8 April 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 111, 08.04.2022, p. 1.

[71] Council Regulation (EU) 2022/576, op. cit., p. 4.

[72] *Morozov Collection Returns to Russia, Culture Minister Says*, "TASS", 5 May 2022, https://tass.com/society/1447219 [accessed: 20.05.2025].

[73] Finnish Customs, *Shipments Detained by Finnish Customs at Vaalimaa Contained Works of Art*, 6 April 2022, https://tulli.fi/en/-/shipments-detained-by-finnish-customs-at-vaalimaa-contained-works-of-art [accessed: 20.05.2025].

[74] S. Rossi, *Italian Museums to Return Loaned Works to Russian Galleries*, "Reuters", 10 March 2022, https://www.reuters.com/world/europe/italian-museums-return-loaned-works-russian-galleries-2022-03-10/ [accessed: 20.05.2025]; *Russia's Hermitage Museum Is Demanding the Early Return of Loans It Made to Italian Museums*, "Artnet", 10 March 2022, https://news.artnet.com/art-world/hermitage-loans-2083407 [accessed: 20.05.2025].

shipment to be in violation of EU sanctions banning the transfer of luxury goods to Russia and therefore seized it until the legal status of the artworks could be clarified. The case, which was publicized diplomatically by Russian Federation authorities and in the media,[75] was resolved on 8 April 2022. The Finnish customs authorities allowed the transport to pass through the border with Russia based on the revised EU Regulation 2022/576. In the same Regulation, the EU also introduced a narrowly defined temporary derogation concerning the export and transfer of cultural goods loaned under formal cultural cooperation with Russia by land, through transport operators established in Russia (Article 3l(4)(e)). This provision is to be understood as a legal regulation of the ongoing activities related to the return to Russia of loaned works and artefacts.

In December 2023, the EU once again clarified the provision banning the sale, export, transfer of luxury goods to Russia as part of its announcement of a twelfth package of sanctions, in Council Decision (CFSP) 2023/2874 and Council Regulation (EU) 2023/2878. The amendment to the Regulation concerns Article 3(1) and specifies the place of origin. The current wording of this Article 3h(1) is as follows: "It shall be prohibited to sell, supply, transfer or export, directly or indirectly, luxury goods, whether or not originating in the Union, as listed in Annex XVIII, to any natural or legal person, entity or body in Russia or for use in Russia".[76]

EU Sanctions in Support of the Protection of Ukraine's Cultural Heritage by Combating Illegal Export and Trade of Cultural Property Goods from Ukraine

Russia's war against Ukraine has not only caused severe destruction of cultural heritage within Ukraine, but has also resulted in the large-scale theft and displacement of cultural goods. According to Mykola Tochytskyi, the Ukrainian Minister of Culture and Strategic Communications, approximately 1.7 million cultural artefacts have been lost in occupied territories.[77] As stated by Mariana Tomyn, Chief of the Cultural Heritage Department at the Ministry of Culture and Information

[75] C. Porterfield, *Finland Seizes $46 Million Worth of Russian Art over EU Sanctions*, "Forbes", 7 April 2022, https://www.forbes.com/sites/carlieporterfield/2022/04/07/finland-seizes-46-million-worth-of-russian-art-over-eu-sanctions/ [accessed: 20.05.2025].

[76] Council Regulation (EU) 2023/2878 of 18 December 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 18.12.2023.

[77] *Mykola Tochyts'kyy, ministr kul'tury ta stratehichnykh komunikatsiy: Yevropeys'ki partnery dopomozhut' Ukrayini zberehty, zakhystyty, evakuyuvaty nash kul'turnyy spadok* [Mykola Tochytskyi, Minister of Culture and Strategic Communications: European Partners Will Help Ukraine Preserve, Protect, and Evacuate Our Cultural Heritage], "Ukrinform", 10 April 2025, https://www.ukrinform.ua/rubric-culture/3980625-mikola-tocickij-ministr-kulturi-ta-strategicnih-komunikacij.html [accessed: 20.05.2025].

Policy of Ukraine, a decade into the start of Russia's aggression against Ukraine in 2014, the total losses of the national museum fund amounted to 2 million items.[78]

Tens of thousands of items were transported from the occupied territories deep into Russia or relocated to museums in occupied Crimea, as in the case of Kherson. With regard to illegal trafficking and looting, it is estimated that they have been or will be subjected to illicit trade, including on the international market. The serious risk of cultural goods and artefacts stolen from Ukraine being smuggled into the EU necessitates action by the Union to counter this threat and to protect Ukraine's endangered cultural heritage.[79]

To this end, the fourteenth sanctions package (Council Decision (CFSP) 2024/1744 and Council Regulation (EU) 2024/1745) of 24 June 2024 introduced a ban on trade in Ukrainian cultural goods suspected of having been unlawfully acquired and exported from Ukraine.[80] The adoption of this ban was an important step on the part of the EU, as it explicitly included restrictive measures on the looting of Ukrainian cultural heritage, the violation of which is a criminal offence and must be punished as an EU crime. The decision to impose a ban on trade in Ukrainian cultural goods of unclear provenance, along with related services facilitating such activity, constitutes the EU's response and support to the challenges that Ukraine has faced since the Russian invasion of its territory began in 2014.[81]

The sanctions adopted in Article 3v of Council Regulation (EU) 2024/1745 refer to both trade in Ukrainian cultural property goods and to related services, thus allowing for the sanctioning and punishment of entities that contribute to and mediate the trade and transfer of illegally acquired artefacts.

> Article 3v
> 1. It shall be prohibited to purchase, import, transfer, sell, supply or export, directly or indirectly, Ukrainian cultural property goods and other goods of archaeological, historical, cultural, rare scientific or religious importance, where there are reasonable grounds to suspect that the goods have been removed from Ukraine without the consent of their legitimate owner or have been removed in breach of Ukrainian law or international law, in particular if the goods form an integral part of the pub-

[78] *Ukraine's Museums Fall Short of 2M Items Due to War*, "Ukrinform", 1 June 2024, https://www.ukrinform.net/rubric-society/3870348-ukraines-museums-fall-short-of-2m-items-due-to-war.html [accessed: 20.06.2025].

[79] A. Jakubowski, *Safeguarding Ukraine's Cultural Heritage in War: Identifying the Obligations of Non-Parties to the Conflict, with Special Focus on the European Union*, "Polish Review of International and European Law" 2024, Vol. 12(2), pp. 141-166.

[80] Council Decision (CFSP) 2024/1744 of 24 June 2024 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 24.06.2024; Council Regulation (EU) 2024/1745 of 24 June 2024 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 24.06.2024.

[81] E. Campfens et al., *Research for CULT Committee: Protecting Cultural Heritage from Armed Conflicts in Ukraine and Beyond*, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels 2023.

lic collections listed in the inventories of the conservation collections of Ukrainian museums, archives or libraries, or of the inventories of Ukrainian religious institutions.
2. It shall be prohibited to provide, directly or indirectly, technical assistance, brokering services, financing or financial assistance or any other services related to the prohibition in paragraph 1.
3. The prohibition in paragraphs 1 and 2 shall not apply if it is demonstrated that:
   (a) the goods were exported from Ukraine prior to 1 March 2014; or
   (b) the goods are being safely returned to their legitimate owners in Ukraine.

It is worth noting that the prohibition in Paragraph 1 specifically applies to objects from public museums, libraries, archives, and religious institutions which were on inventory registers. This raises a systemic problem and a challenge for the Ukrainian authorities. Prior to the outbreak of full-scale war in 2022, Ukraine's system for cataloguing, inventorying, and digitizing collections was poorly developed, which now hinders the identification of objects and their protection from illegal export. It is estimated that only 10%-15% of museum collections have been digitized in Ukraine so far.[82] Supporting digitization is one of the tasks funded by the EU, but the scale of the challenge is enormous and requires a strong international commitment.

Paragraph 2 of Article 3v of Council Regulation (EU) 2024/1745 should be read in conjunction with another provision set out in that Council Regulation, namely Article 3s, Paragraph 2(d), which extended the categories of Russian vessels subject to sanctions to include those transporting stolen Ukrainian cultural goods, which are to be listed in Annex XVI of that Decision. As a result of this sanction, the *Enisey* was added to the list of vessels subject to EU restrictive measures on 25 June 2024.[83]

In addition, Article 3v of Council Regulation (EU) 2024/1745 introduced Paragraph 3, which sets out two types of exemptions from the prohibition. The provision does not apply to cultural goods exported from Ukraine before 1 March 2014 or to goods that are being returned to their rightful owners in Ukraine. The designation of 1 March 2014 as the precise cut-off date for the exemption from the ban formally extends the capacity to detect and combat the illicit trade in cultural goods originating from Ukraine to the entire war period, as the ongoing conflict has facilitated offences against Ukrainian cultural goods and their unlawful circulation. The adoption of these measures imposes on institutions acquiring cultural property from Ukraine, as well as on all participants in the EU art market, an obligation to exercise particular caution and due diligence in cases of cultural goods and artefacts identified as originating from Ukraine in view of the potential legal consequences of non-compliance with these restrictive measures.

82 *Mykola Tochyts'kyy…*

83 Council Decision (CFSP) 2024/1744; Council Regulation (EU) 2024/1745, op. cit., Annex XLII, no. 18.

The competent authorities of the Member States, namely customs, tax, and law enforcement authorities, together with Europol and Interpol, have a key role to play in this regard.

The adoption of these sanctions also fits into the broader context of the development of EU cultural heritage law and policies in recent years.[84] One of the Union's objectives in this area is to establish a coherent system for preventing and combating the illicit trade in cultural goods within the EU. This involves adopting legal solutions and instruments across various fields of activity and competence, at both the EU and Member State levels.[85]

In 2019, the Union adopted Regulation (EU) 2019/880 on the introduction and import of cultural goods,[86] which became binding in its entirety and directly applicable in all EU Member States on 28 June 2025, and which has very significant regulatory implications for the circulation of cultural goods within and outside the EU. In 2022, the European Commission announced the EU Action Plan against Trafficking in Cultural Goods, which was subsequently endorsed by the Member States in the Council Conclusions on the fight against trafficking in cultural goods adopted in 2023.

The EU has integrated the protection and enhancement of cultural heritage into its external action in the EU's Foreign and Security Policy, as reflected, inter alia, in the Strategy for the Protection of Cultural Heritage in Conflicts and Crises adopted in the Council Conclusion in 2021.[87]

The inclusion in the EU sanctions regime of a ban on trade in Ukrainian cultural goods of dubious origin, in response to Russia's actions to destabilize the situation in Ukraine, thus reinforces the EU's system for combating the smuggling and illicit trade in cultural property. It also affirms that the Union recognizes the protection of cultural heritage in third countries as an important component of its foreign and security policy.[88] In conjunction with other applicable instruments of international law (UNESCO 1970 Convention, UNIDROIT 1995 Convention) and intra-EU regulations to combat the illegal trafficking of cultural property, the European Union, in cooperation with international partners, is building a system which, if effectively implemented by EU Member States, is expected to enhance the EU's ability to combat the illicit trafficking of cultural property, thereby contributing to Ukraine's efforts to safeguard its cultural heritage during the ongoing war on its territory.

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84 A. Jakubowski, K. Hausler, F. Fiorentini (eds.), *Cultural Heritage in the European Union: A Critical Inquiry into Law and Policy*, Brill Nijhoff, Leiden–Boston 2019.

85 Ibidem, pp. 11-17.

86 Regulation (EU) 2019/880 of the European Parliament and of the Council of 17 April 2019 on the introduction and the import of cultural goods, OJ L 151, 07.06.2019, p. 1.

87 K. Hausler, *The EU Approach to Cultural Heritage in Conflict and Crisis: An Elephant in the Room?* "Santander Art and Culture Law Review" 2021, Vol. 2(7), pp. 193-202.

88 D. Jurkiewicz-Eckert, *Cultural Heritage as a Field…*

Conclusions

With the perspective gained from four years since the implementation of the EU's cultural sanctions on Russia, as well as measures adopted following Russia's aggression against Ukraine, it is now possible to undertake a preliminary – albeit necessarily fragmentary – assessment of their effectiveness. Following 24 February 2022, the Union imposed sanctions on Russia in the field of culture and trade in cultural goods. Works of art and collectibles, as valuable assets belonging to sanctioned members of the Russian elite who support the Putin regime, may formally be subject to asset freezes. Responsibility for the looting of Ukrainian cultural heritage and for policies of Russification in the occupied territories also constitute grounds for inclusion on the EU sanctions list. In addition, seeking to support the protection of Ukraine's cultural heritage, the Union adopted separate measures aimed at combating the illicit trade in Ukrainian cultural property as well as in other goods of archaeological, historical, cultural, scientific, or religious significance. Through these actions, the Union thus conveyed a clear political and normative message, albeit with an ultimately limited impact.

Why? Because cultural sanctions are only partially systemic, in part insufficient, and demonstrably ineffective in some areas. They also pertain to a domain which, within the globalized art trade,[89] has a significant capacity for adaptation and operation in grey zones. However, this should not diminish the significance of the EU's decision to impose sanctions on the export and transfer of luxury goods to Russia, including works of art, antiques, and collectors' pieces. While this move by the Union did not entirely sever the Russian market and Russian clients from the European art market, it certainly made their participation considerably more difficult and restricted their activity. In this respect, the objective of the sanctions, namely to hinder the functioning of Russian elites, has been, to some degree, achieved.

An analysis of publicly available sources, however, makes it clear that the individual sanctions imposed on Russian oligarchs, which involved asset freezing of artworks and other cultural artefacts in their ownership, have in practice been enforced only in a limited number of cases. Given the scale of assets held by Russian elites and the number of artworks that are most likely still in their possession, the actual impact of such measures has been highly unsatisfactory and, in practical terms, negligible, despite attracting considerable media attention. Documented cases (e.g. the transfer of ownership of a collection by Roman Abramovich) demonstrate that Russia's financial elites have taken deliberate steps to shield their collections from possible freezes. Thus, adding oligarchs and members of the Russian

[89] According to *The Art Basel and UBS Art Market Report 2025*, sales in the global art market in 2024 were estimated at US$57.5 billion, and EU sales at US$8.3 billion. See C. McAndrew, *The Art Basel and UBS Art Market Report 2025 by Arts Economics*, https://theartmarket.artbasel.com/download/The-Art-Basel-and-UBS-Art-Market-Report-2025.pdf [accessed: 20.05.2025].

elite to the sanctions list does not necessarily lead to the effective application of restrictive measures to art collections held in their possession.

As I have demonstrated in an article devoted to the impact of the war in Ukraine on the cooperation between European and Russian museums since 24 February 2022, this is an area in which the sanctions imposed by the EU and the UK have undoubtedly contributed to the continuing, virtually complete suspension of cooperation between European museums and their Russian counterparts. In addition to the formal suspension of cooperation during the first weeks of the war and the withdrawal from planned loans for museum exhibitions scheduled for 2022 and 2023,[90] this effective end to collaboration has also been driven by the introduction of EU and UK transport and economic sanctions. These include a prohibition against trading and transferring works of art and antiques to Russia, as well as Russia's exclusion from the SWIFT system, which, inter alia, made it impossible to insure artworks loaned for temporary exhibitions. At the same time, the EU had to align the adopted sanctions with the rules governing the international museum loans regime and the principle of immunity from seizure, which protected works loaned from Russian museums for temporary exhibitions in several European countries in 2022, including at the outbreak of Russia's invasion of Ukraine on 24 February 2022, which started the country's full-scale war.[91]

Several Russian pop artists and only a few Russian officials responsible for the destruction of Ukrainian culture and the looting of Ukraine's cultural heritage were also added to EU sanctions lists and banned from entering the EU. Only one museum from the illegally occupied territories of Crimea and eastern Ukraine was listed. The number of sanctioned institutions, officials, and other individuals responsible for the destruction and seizure of Ukraine's cultural heritage, as well as those working to Russify and falsify the history of seized objects and cultural property, remains very limited for the time being. The list further fails to include key figures – for example, the directors of major Russian state museums who actively support the Kremlin's actions and rhetoric or Russian experts, officials, and military officers who took part in the destruction and plundering of Ukraine's cultural heritage.[92] Simultaneously, the EU, in its official discourse, identifies the looting of Ukrainian cultural heritage as a key justification for the imposition of restrictive measures, citing it as one of ten specific grounds for individual sanctions

[90] D. Jurkiewicz-Eckert, *European Museum Cooperation…*, pp. 102-105.

[91] Ibidem, pp. 94-101.

[92] In February 2025, Ukraine listed 55 people involved in looting Ukraine's cultural heritage in occupied Crimea on its sanctions lists. See O. Goncharova, *Ukraine Imposes Sanctions on Russian 'Shadow Fleet' Captains, Cultural Heritage Looters*, "The Kyiv Independent", 5 February 2025, https://kyivindependent.com/ukraine-imposes-sanctions-on-russian-shadow-fleet-captains-and-cultural-heritage-looters/ [accessed: 20.05.2025].

on the Council's official website.[93] A more extensive and active involvement in this area would be advisable.

As part of its fourteenth sanctions package in 2024, the EU took an important step by banning trade in cultural objects potentially looted from Ukrainian territory since 2014. This measure not only constitutes a significant part of the EU's support for Ukraine, but is also intended to strengthen the international system for combating the illicit trade in cultural goods.[94] If the Union and its Member States, in cooperation with international organizations, successfully and consistently use the legal mechanisms that have been established to combat this practice, it will constitute an important step towards legitimizing the EU's aspirations to be a credible actor in international relations when it comes to protecting cultural heritage.[95]

Cultural sanctions imposed by the EU form part of a broader set of sanction regimes targeting Russia in this area. These measures are coordinated with those adopted by the United States and the United Kingdom, the latter having introduced even more stringent restrictions on trade in cultural property with Russia. The sanctions imposed by the UK, the USA, the EU, and other countries on Russian oligarchs and elites had a considerable impact, reshaping the operations of leading art markets and forcing auction houses to adjust to the new regulatory environment.[96] The same applies to museums and other institutions that had previously benefited from the generous support of Russian patrons. The success of EU cultural sanctions therefore also depends on the effectiveness and coordination of the broader system of sanctions imposed by the West in response to Russia's war of aggression against Ukraine.

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[93] European Council, Council of the European Union, *EU Sanctions against Russia*, https://www.consilium.europa.eu/en/policies/sanctions-against-russia/ [accessed: 27.10.2025].

[94] *Mykola Tochyts'kyy…*

[95] The adoption of sanctions protecting Ukrainian cultural property from illicit export and trade abroad was identified by the EEAS in the *2024 Report on the Progress in the Implementation of the 'Concept on Cultural Heritage in Conflicts and Crises. A Component for Peace and Security in the European Union's External Action' and the Dedicated Council Conclusions*, 29 November 2014, EEAS (2024) 1025 REV 1, both as a measure for protecting Ukraine's cultural heritage and as one of the EU's actions in the fight against the illicit trafficking of cultural property.

[96] *What is the Luxury Goods Ban, and What Does It Mean for the Art Market, Including Your Business?* https://knowledgebase.artaml.com/what-is-the-luxury-goods-ban [accessed: 20.05.2025].

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