

21 February 2024

**Open letter to:**

Justin Trudeau, Prime Minister of Canada  
Emmanuel Macron, President of the Republic of France  
Olaf Scholz, Chancellor of the Federal Republic of Germany  
Giorgia Meloni, Prime Minister of Italy  
Fumio Kishida, Prime Minister of Japan  
Rishi Sunak, Prime Minister of the United Kingdom  
Joe Biden, President of the United States of America  
Ursula von der Leyen, President of the European Commission  
Charles Michel, President of the European Council  
Roberta Metsola, President of the European Parliament

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 transshipment 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.  | <i>Transport &amp; Environment</i>                          | <i>Belgium, EU</i> |
| 2.  | <i>NGO Center for Environmental Initiatives "Ecoaction"</i> | <i>Ukraine</i>     |
| 3.  | <i>Razom We Stand</i>                                       | <i>Ukraine</i>     |
| 4.  | <i>Centre for Research on Energy and Clean Air (CREA)</i>   | <i>Finland</i>     |
| 5.  | <i>Deutsche Umwelthilfe</i>                                 | <i>Germany</i>     |
| 6.  | <i>Leave it in the Ground Initiative (LINGO)</i>            | <i>Belgium</i>     |
| 7.  | <i>Green Transition Denmark</i>                             | <i>Denmark</i>     |
| 8.  | <i>Bond Beter Leefmilieu</i>                                | <i>Belgium</i>     |
| 9.  | <i>Ukrainian Security and Cooperation Center</i>            | <i>Ukraine</i>     |
| 10. | <i>Danube-Carpathian Programme</i>                          | <i>Ukraine,</i>    |
| 11. | <i>Climate Action for Lifelong Learners (CALL)</i>          | <i>Canada</i>      |
| 12. | <i>For a Better Bayou</i>                                   | <i>USA</i>         |
| 13. | <i>2Celsius</i>   | <i>Romania</i>     |
| 14. | <i>VšĮ Žiedinė ekonomika</i>                                | <i>Lithuania</i>   |
| 15. | <i>EKOenergy ecolabel</i>                                   | <i>Finland</i>     |
| 16. | <i>Net Impact The Gambia</i>                                | <i>Gambia</i>      |

17.	<i>Oil and Gas Action Network</i>	USA
18.	<i>Wall of Women</i>	USA
19.	<i>Institute of legislative ideas</i>	Ukraine
20.	<i>Egyptian Green Party</i>	Egypt
21.	<i>Earth Action, Inc.</i>	USA
22.	<i>Disability Peoples Forum Uganda</i>	Uganda
23.	<i>International Partnership for Human Rights</i>	Belgium
24.	<i>Public Eye</i>	Switzerland
25.	<i>Clean Air Action Group</i>	Hungary
26.	<i>Expert Forum (EFOR)</i>	Romania
27.	<i>ICO "Environment - People - Law"</i>	Ukraine
28.	<i>NGO "Technology of Progress"</i>	Ukraine
29.	<i>NGO "Open Data Association"</i>	Ukraine
30.	<i>Milieudefensie   Friends of the Earth NL</i>	Netherlands
31.	<i>NGO Ecoclub Rivne</i>	Ukraine
32.	<i>Transform Scotland</i>	Scotland
33.	<i>Uplift</i>	United Kingdom
34.	<i>NGO Sustainable Development Agency SYNERGY</i>	Ukraine
35.	<i>NGO Social Initiative "City of the Sun"</i>	Ukraine
36.	<i>Black Sea Women's Club</i>	Ukraine
37.	<i>NGO Environmental Club Eremurus</i>	Ukraine
38.	<i>Anti-corruption Headquarters</i>	Ukraine
39.	<i>NGO Ekoltava</i>	Ukraine
40.	<i>Institute for Social and Economic Transformation</i>	Ukraine
41.	<i>Planet Botanical Garden</i>	Ukraine
42.	<i>Plato NGO</i>	Ukraine
43.	<i>Ukrainian Nature Conservation Group</i>	Ukraine
44.	<i>Anti-Corruption Research and Education Centre</i>	Ukraine
45.	<i>Andy Gheorghiu Consulting</i>	Germany
46.	<i>Clean Cities Campaign Poland</i>	Poland
47.	<i>Nordic Ukraine Forum</i>	Sweden
48.	<i>EUROPEUM Institute for European Policy</i>	Czech Republic
49.	<i>Formando Rutas</i>	Germany
50.	<i>FPPE</i>	Poland
51.	<i>Center for the Study of Democracy</i>	Bulgaria
52.	<i>Association "Energy Efficient Cities of Ukraine"</i>	Ukraine
53.	<i>Naturschutzbund Deutschland (NABU) e.V.</i>	Germany
54.	<i>Rainforest Action Network</i>	USA
55.	<i>Uppsala University</i>	Sweden
56.	<i>Institute for Economic Research and Policy Consulting</i>	Ukraine
57.	<i>Eco Bucha</i>	Ukraine
58.	<i>Deutsche Umwelthilfe e.V.</i>	Germany
59.	<i>CEE Bankwatch Network</i>	Romania
60.	<i>Instytut Spraw Obywatelskich</i>	Poland

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'ARROCHA* DRC
75. *Asociación 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 Verkehrs-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
99. *Zero Waste Society* Ireland
100. *Canopea* Belgium
101. *Limity jsme my* Czech republic
102. *Earthsight* United Kingdom
103. *Businesses for a Livable Climate* USA

104.	<i>Call to Action Colorado</i>	USA
105.	<i>CatholicNetwork US</i>	USA
106.	<i>Colorado Businesses for a Livable Climate</i>	USA
107.	<i>Community for Sustainable Energy</i>	USA
108.	<i>Greater New Orleans Housing Alliance</i>	USA
109.	<i>Green House Connection Center</i>	USA
110.	<i>Indivisible Ambassadors</i>	USA
111.	<i>Interstate 70 Citizens Advisory Group</i>	USA
112.	<i>Larimer Alliance for Health, Safety, &amp; Environment</i>	USA
113.	<i>Littleton Business Alliance</i>	USA
114.	<i>Mayfair Park Neighborhood Association</i>	USA
115.	<i>Mental Health &amp; Inclusion Ministries</i>	USA
116.	<i>Mind's Eye Productions</i>	USA
117.	<i>Montbello Neighborhood Improvement Association</i>	USA
118.	<i>North Range Concerned Citizens</i>	USA
119.	<i>Our Sacred Earth</i>	USA
120.	<i>RapidShift Network</i>	USA
121.	<i>Save the Environmental Protection Agency</i>	USA
122.	<i>Small Business Alliance</i>	USA
123.	<i>Southwest Organization for Sustainability</i>	USA
124.	<i>Spirit of the Sun</i>	USA
125.	<i>System Change Not Climate Change</i>	USA
126.	<i>Texas Campaign for the Environment</i>	USA
127.	<i>Unite North Metro Denver</i>	USA
128.	<i>Wall of Women</i>	USA
129.	<i>Western Slope Businesses for a Livable Climate</i>	USA
130.	<i>Womxn from the Mountain</i>	USA
131.	<i>Working for Racial Equity</i>	USA
132.	<i>Climate Risk Horizons</i>	India
133.	<i>ZERO – Association for the Earth System Sustainability</i>	Portugal
134.	<i>Association of Ethical Shareholders</i>	Germany
135.	<i>Ukrainian Network of Integrity and Compliance (UNIC)</i>	Ukraine
136.	<i>NGO "Unique Planet"</i>	Ukraine
137.	<i>NGO Green Liberty</i>	Ukraine
138.	<i>NGO SaveDnipro</i>	Ukraine
139.	<i>NGO "Office for the Environment"</i>	Ukraine
140.	<i>NGO "Green Generation"</i>	Ukraine
141-230.	<i>Business for Ukraine Coalition, on behalf of 89 international and Ukrainian members</i>	
231-241.	<i>Energy Transition Coalition, uniting 10 Ukrainian organizations.</i>	
242-280+.	<i>RISE Ukraine Coalition, uniting more than 50 organizations.</i>	