

EU LNG and Pipeline Gas Import Ban - Timing under EU Sanctions (Article 3ra) vs RePowerEU



How the Timeline Applies to LNG and Pipeline Gas Contracts:

Type of LNG or Pipeline Gas Contract	LNG Contracts - RePowerEU (Reg 2026/261)	LNG Contracts - Sanctions (Reg 833/2014)	Pipeline Gas Contracts - RePowerEU (Reg 2026/261)
Short-term contract concluded before 17 June 2025 with no material amendments.	Art 4(1) – 25 April 2026 cut off.	Art 3ra – 25 April 2026 cut off.	Art 4(1) – 17 June 2026 cut-off.
Short-term contract concluded before 17 June 2025 with material amendments.	Import into the EU <u>not permitted</u> from 18 March 2026 (Art 14).	EU operators can engage in such transactions <u>globally</u> until 25 April 2026. But note RePowerEU position – i.e. so long as there is no import into the EU from 18 March 2026.	Import into the EU <u>not permitted</u> from 18 March 2026 (Art 14).
Contract concluded on or after 17 June 2025.	Import into the EU <u>not permitted</u> from 18 March 2026 (Art 14).	EU operators can engage in such transactions <u>globally</u> until 25 April 2026. But note RePowerEU position – i.e. so long as there is no import into the EU from 18 March 2026.	Import into the EU <u>not permitted</u> from 18 March 2026 (Art 14).
Long-term contract concluded before 17 June 2025 with no material amendments.	Art 4(3) – 1 January 2027 cut off.	Art 3ra(2) – 1 January 2027 cut off.	Art 4(2) – 30 September 2027 cut-off (Member States can exceptionally extend the deadline until 31 October 2027 if their gas storage facilities are filled below required levels).
Long-term contract concluded before 17 June 2025 with material amendments.	Import into the EU <u>not permitted</u> from 18 March 2026 (Art 14).	EU operators can engage in such transactions <u>globally</u> until 25 April 2026. But note RePowerEU position – i.e. so long as there is no import into the EU from 18 March 2026.	Import into the EU <u>not permitted</u> from 18 March 2026 (Art 14).

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