

Taking the Pulse of Major Sanctions Lists

January - June 2025

Contents



Introduction

Sanctions are constantly changing. By analyzing trends and tracking shifts in policy, LexisNexis® Risk Solutions helps global organizations better understand the geopolitical climate and evolve their compliance strategies accordingly.

Data from the four core regulators – the **United Nations (UN)**, **European Union (EU)**, **Office of Foreign Assets Control (OFAC)** and the **UK Office of Financial Sanctions Implementation (OFSI)** – feeds our analysis in this edition of the Sanctions Pulse.

After what might be described as a storm of sanctions activity since 2022, recent data points to a moderation in sanctions growth. Only 1,397 targets were added in H1 2025, compared to 2,340, 2,050 and a staggering 3,854 for the same period in 2024, 2023 and 2022 respectively.

Signals from the EU and UK appear to allude to another round of sanctions, so it is unclear whether the H1 2025 sanctions “pause” will continue. What is clear from the data, is that sanctions overall remain a popular tool for governments – except for the UN, which has had very little activity over the last few years.

Although sanctions growth for the EU and UK is overwhelmingly driven by the war in Ukraine, there has been substantial sanctions divergence post Brexit. We expect to see more fragmentation in alignment and divergence going forward.

We hope the information in this H1 2025 edition of the Sanctions Pulse will provide valuable insight for assessing sanctions compliance readiness in the face of evolving activity as the rest of the year unfolds.



What do we mean by sanctions activity?

Global sanctions activity involves **measures by governments and international organizations** to restrict trade, financial transactions, and other forms of engagement with individuals, entities, or countries that threaten international peace, security, or human rights.

Key players in imposing these sanctions globally include the UN, EU, OFAC, and OFSI. Sanctions come in various forms, such as asset freezes, travel bans, arms embargoes, and trade restrictions.

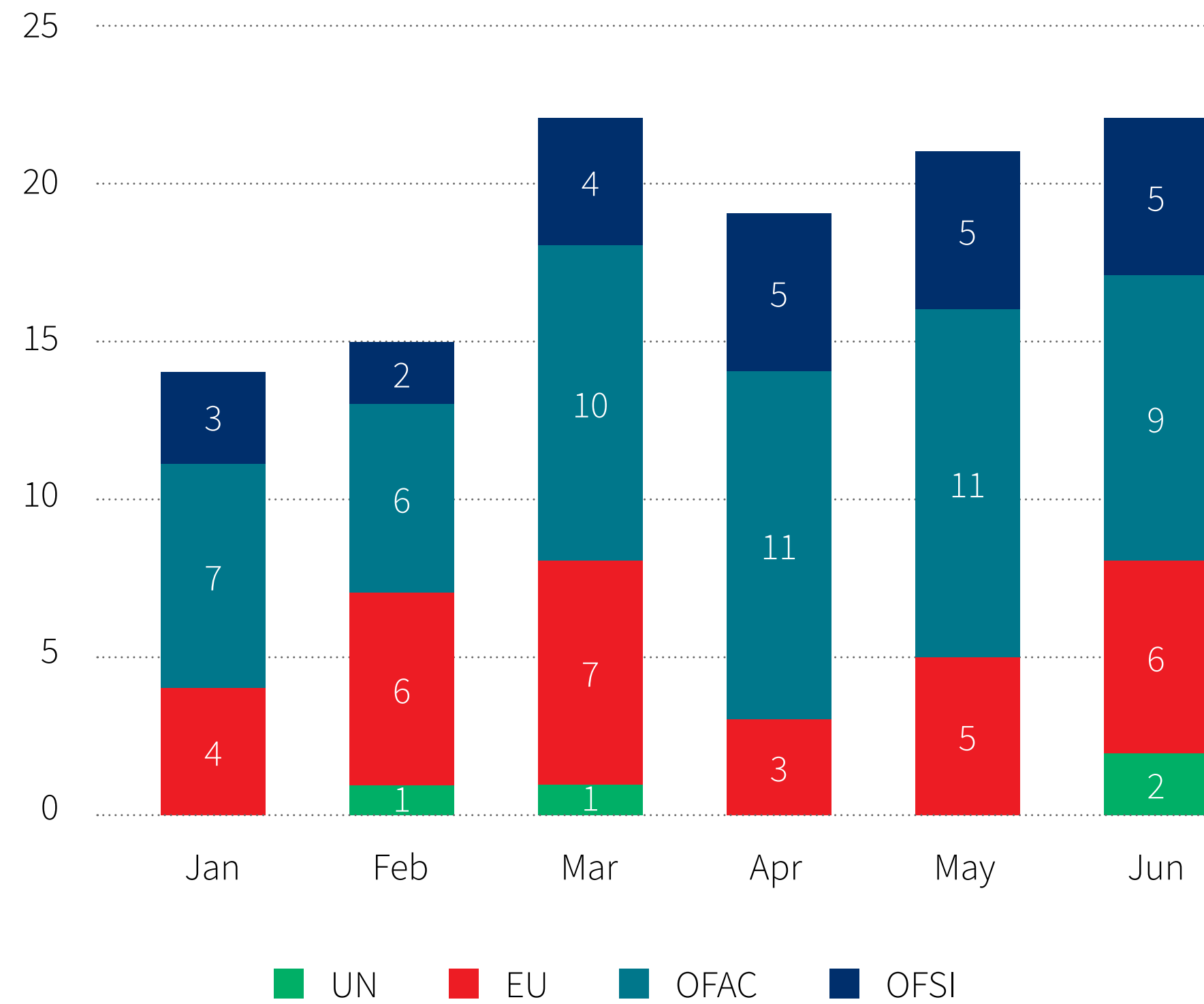
The economic and political impacts of sanctions are significant, as they can drastically limit a target's ability to conduct international trade and access financial systems. However, the effectiveness of sanctions is uncertain and depends on several factors, including the target's willingness to change its behavior, the international community's commitment to enforcing sanctions, and the target's ability to adapt by finding alternative financing and trade sources. Sanctions may also have unintended consequences, such as harming the civilian population of the targeted country.

Sanctions will likely remain a crucial tool in the geopolitical landscape, with ongoing developments and changes in sanctions policies shaping global politics and trade. Businesses must stay updated on sanctions activity to avoid inadvertently engaging with sanctioned entities or individuals. Non-compliance with sanctions regulations can result in severe financial and reputational damage, including fines, penalties, and legal action, as well as loss of business opportunities and damaged relationships with customers, suppliers, and partners.

Sanctions are constantly evolving, with new entities and individuals added to lists and existing records updated. Therefore, it is vital for businesses to have a robust sanctions compliance program, including regular screening of customers, vendors, and business partners against sanctions lists, and implementing appropriate risk-mitigation measures.

An overview of sanctions activity

Number of list updates per agency H1 2025



Number of updates to the UN, EU, OFAC and OFSI lists

2025 H1 **113**
-23% vs. H1 2024

Net designations added

+1,397
-40% vs. H1 2024

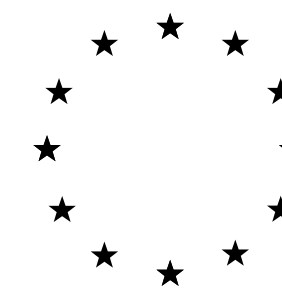
2024 H1 **146**

+2,340

Change in update frequency H1 2024 vs H1 2025



-55%



+3%



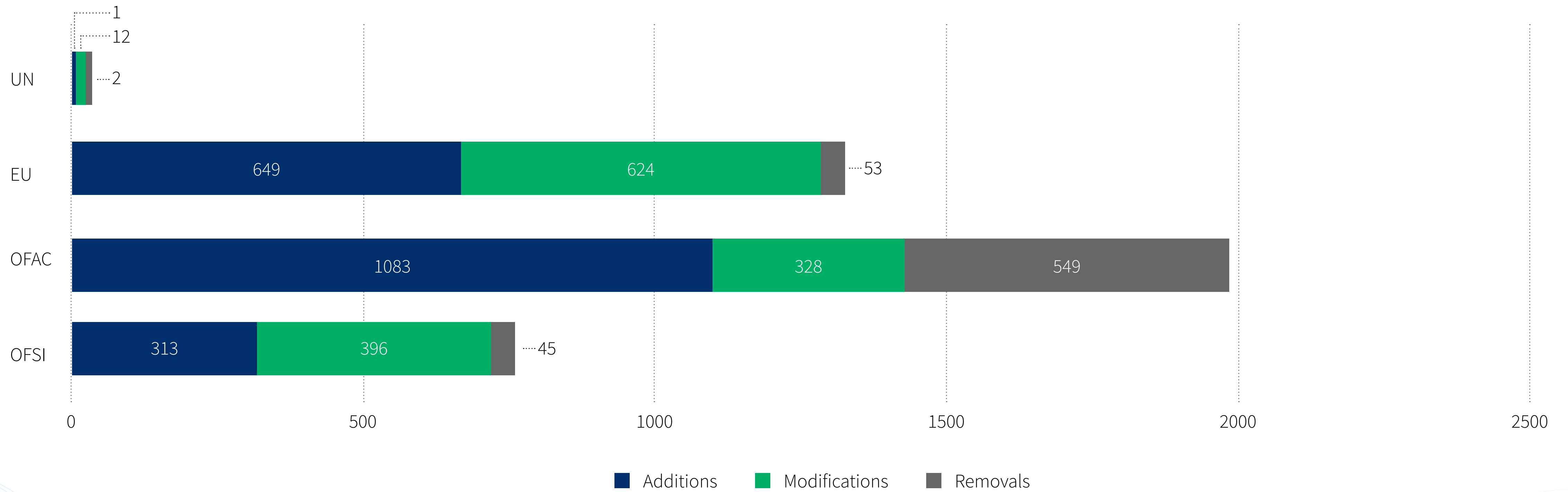
-22%



-39%

Overall global changes H1 2025

H1 2025 Global Changes



Key sanctions activity

Sanctions activity appears to be slowing

23% decrease in the frequency of list updates vs. H1 2024

- 113 list updates
- UN accounted for the greatest decrease (-55%)

Decrease in sanctions targets reflects lifting sanctions when objectives are met:

- +1,397 net additions across the four lists (2,046 added and 649 removed)
- 40% net decrease vs. H1 2024
- Eased sanctions on Syria accounted for substantial delistings (although sanctions remain on the former Al-Assad regime)

Slow down largely driven by OFAC


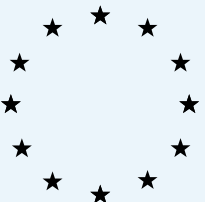
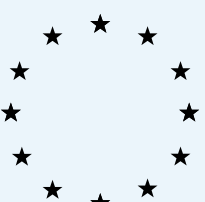


- OFAC designations declined by 66% from compared to H1 2024. OFAC net additions (534) were below those of the EU (596), a divergence from previous analysis
- However, the OFAC list was also the most volatile, with 48% of the H1 updates





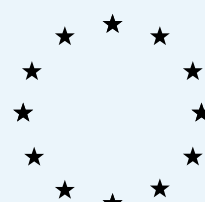
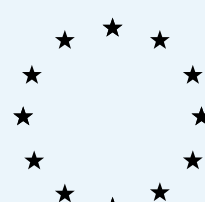



Landmark actions

Largest designations

	Jan 10 th	Russia & Venezuela	+410
	May 20 th	Russia & Chemical Weapons	+353
	Feb 24 th	Russia	+210
	Jan 15 th	Russia	+168
	May 9 th	Russia	+110

Largest delistings

	Jun 30 th	Syria - 167 entries redesignated	-518
	Mar 6 th	Syria	-24
	May 27 th	Syria - 352 targets modified	-22
	Mar 14 th	Russia	-15
	Jan 13 th	Venezuela - Narcotics	-14

Other notable developments

Russia remains the predominant sanctions target

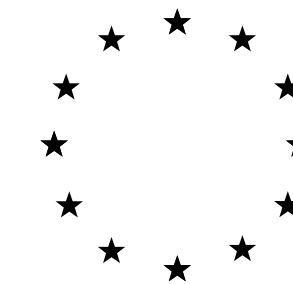
Despite the change in U.S. sanctions policy toward Russia, the extensive measures imposed in the final weeks of the Biden administration carried significant weight in H1 2025, putting pressure on Russia's energy and financial sector. These changes were largely mirrored in later moves by the EU and UK.

Sanctions on Syria ease substantially

For more than a decade, Syria has been crippled by some of the West's broadest sanctions. With the fall of the Al-Assad regime, sanctions have now been recalibrated. These changes illustrate that where policy outcomes are met, sanctions can be reversed.

Vessel sanctions on the rise

OFAC, the EU and OFSI all implemented sanctions on Russia's shadow fleet, a clandestine network of vessels that aim to evade international sanctions and maintain the flow of Russian oil to global buyers.



+263

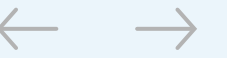


+187



+179

Vessels designated under Russia Sanctions, **H1 2025**



A closer look by agency: **United Nations**



UN sanctions are binding across all 193 Member States. Historically the UN has set the baseline for international sanctions, but it has remained largely "on mute" for sanctions in recent years.

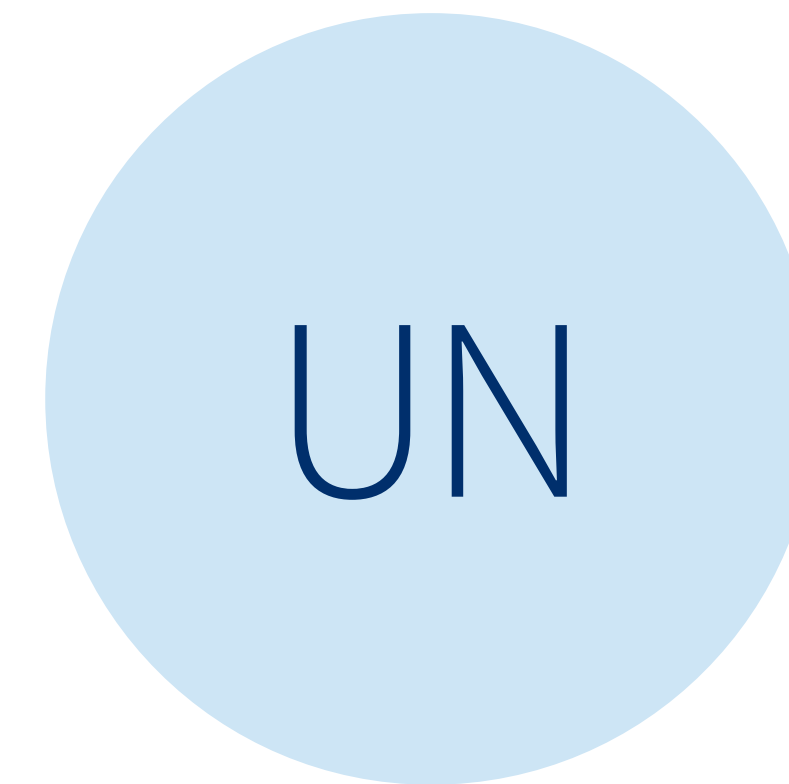
For years there has been minimal sanctions activity from the UN Security Council. H1 2025 was no exception.

- Only 4 updates were made, all under the Da'esh/Al-Qaida Sanctions Committee
- The UN updated listing information for 12 targets in March



Activity:
15 designations
added, modified
or removed

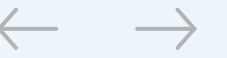
through
4
updates...



Resulting in

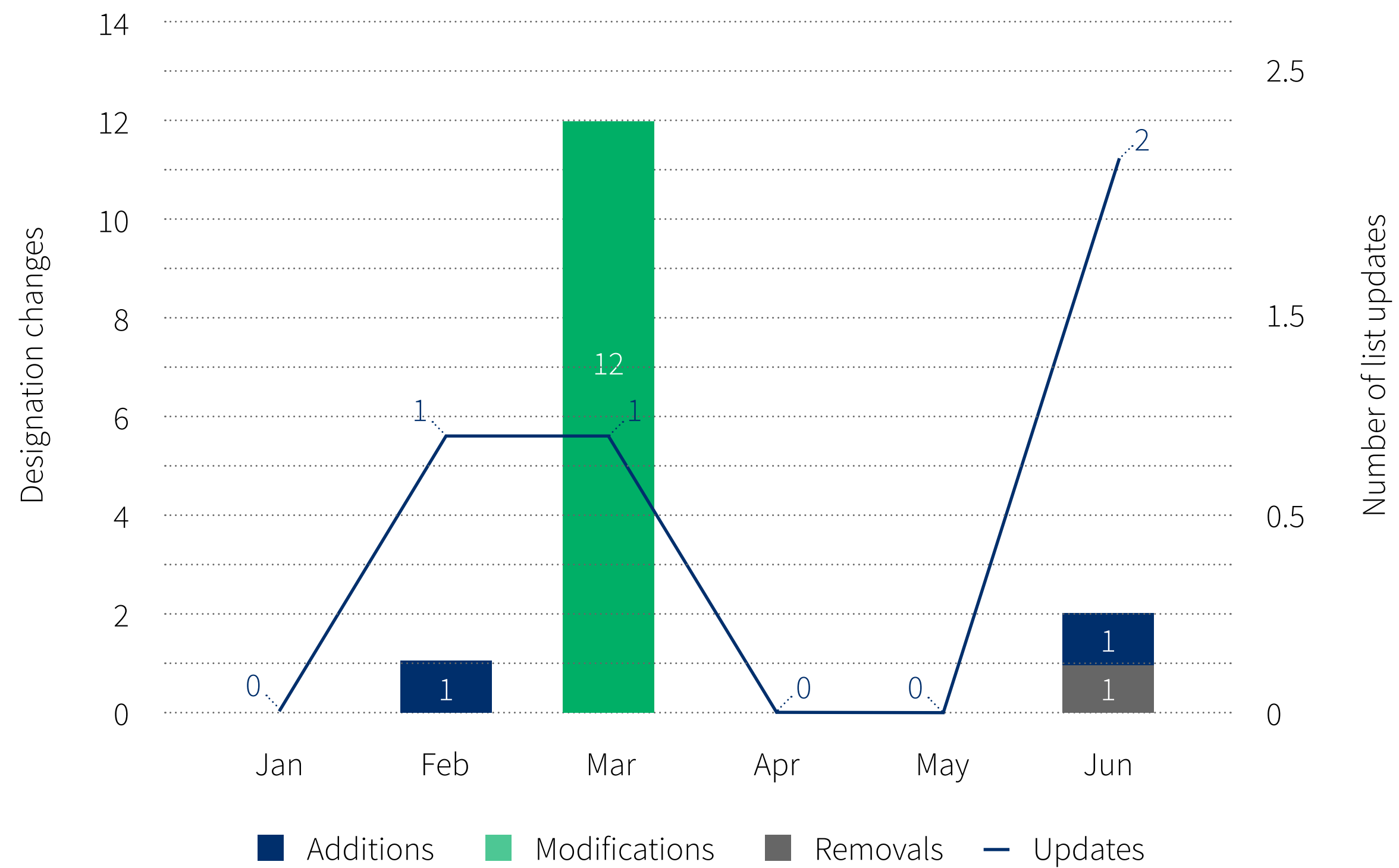
- **1**
net change of
designations

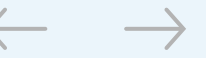




A closer look by agency: United Nations

UN updates: Scale and Nature of Changes





A closer look by agency: **European Union**



The European Union maintained its sanctions pace

- The 16th and 17th sanctions packages, adopted in February and May, respectively, contributed to more than 90% of net additions in H1
- The EU published large batches of modifications affecting Syria and Russia-related targets, and updated the “statements of reasons” (explanations on why a person or entity remains sanctioned)
- H1 concluded with moderate activity in June as negotiations for the 18th Package were still underway

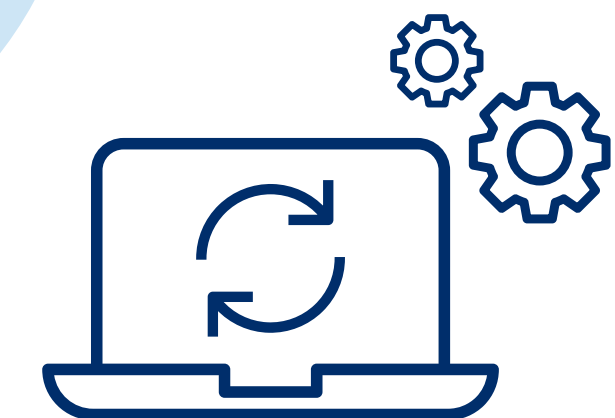


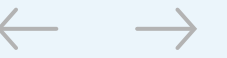
Activity:
1,326 designations
added, modified
or removed

through
31
updates...

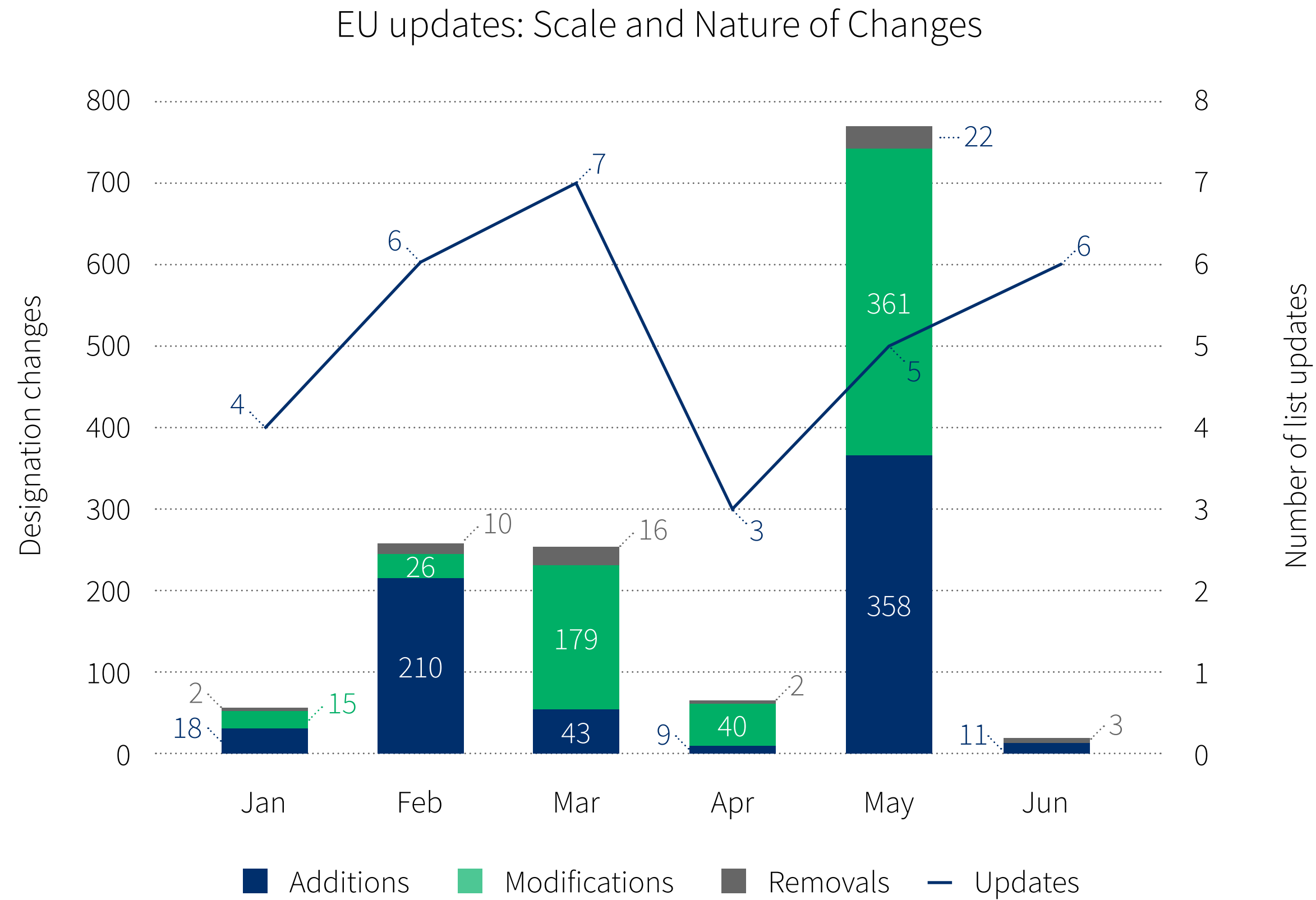


Resulting in
+ 596
net change of
designations



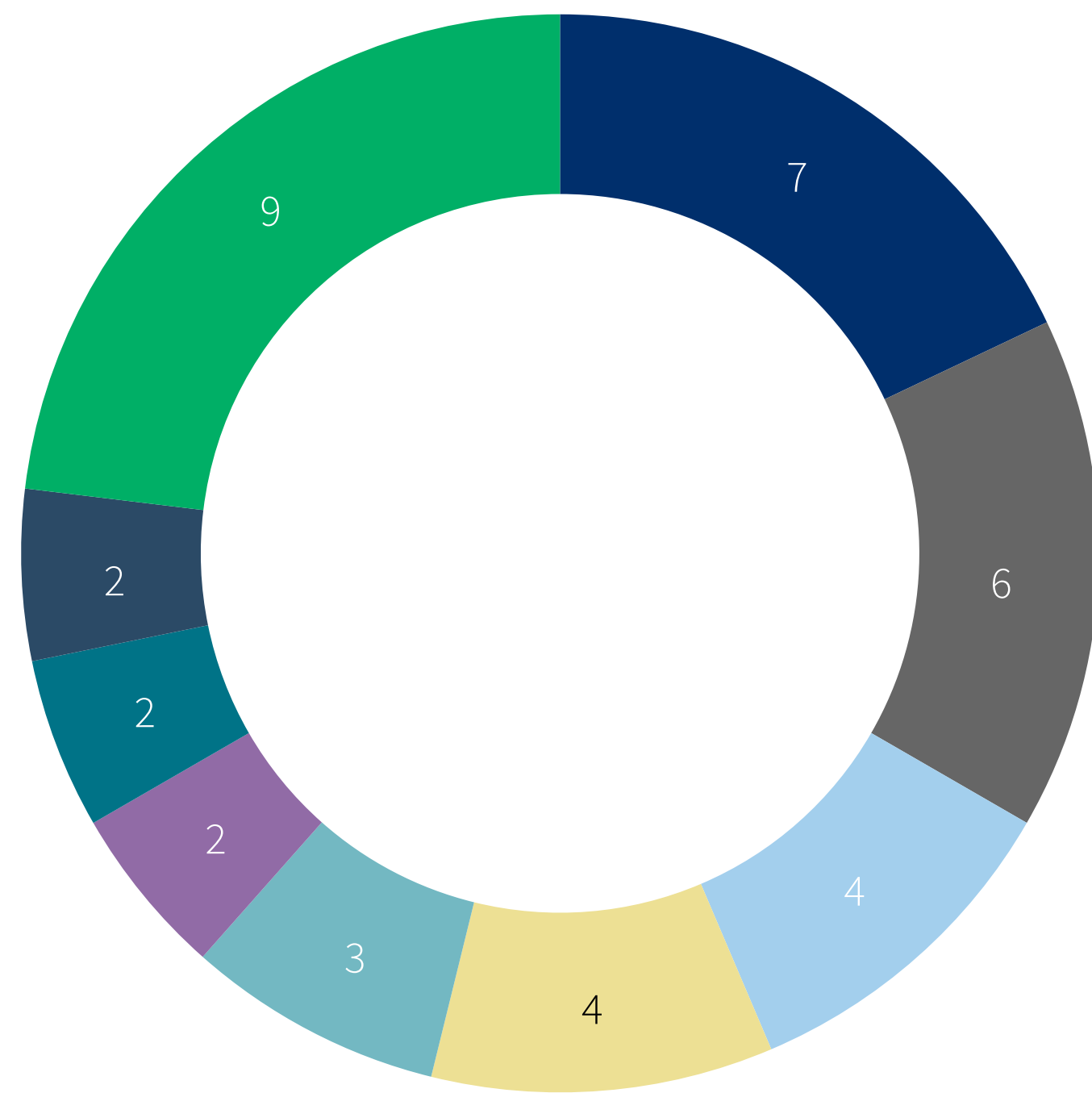


A closer look by agency: European Union



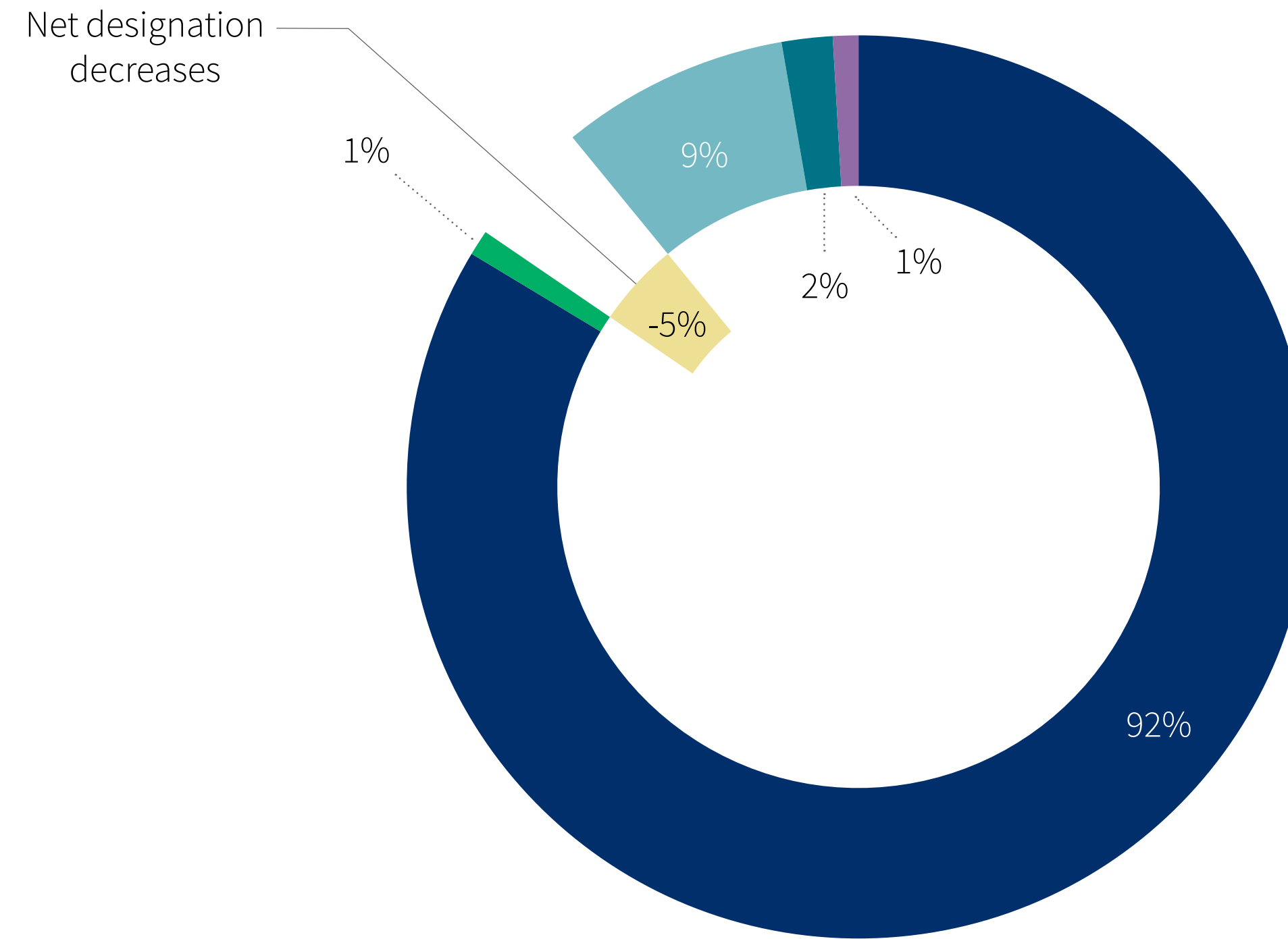
A closer look by agency: European Union

Breakdown by number of updates*



- Russia
- Terrorism
- Human Rights
- Syria
- Belarus
- Iran
- Libya
- Cyber
- Others (x9)

Share of net additions by designation



- Russia
- Iran
- Syria
- Other Countries
- Human Rights & Corruption
- Other Thematic Sanctions

Key sanctions activity: European Union

Russia-related sanctions

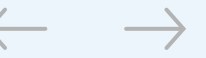
- Targets are increasingly located outside of Russia
- Russian financial sector: 13 financial institutions subject to the “SWIFT Ban;” three banned for engaging in the System for Transfer of Financial Messages (SPFS)
- Vessel designations accounted for approximately 50% of Russia-related targets

Country-related sanctions beyond Russia

- **Belarus (+32):**
for their support to Russia
- **Venezuela (+15):**
undermining rule of law and grave human rights issues
- **Congo DR (+10):**
conflict escalation fueled by Rwandan armed groups
- **Guatemala (+4):**
actions undermining peaceful transfer of power

Thematic sanctions

- **Global Human Rights (+10):**
arbitrary killings against civilians in Syria
- **Chemical Weapons (+3):**
CWC violations by Russia on the front-lines
- **Cyber (+3):**
cyber-attack with significant effect on Estonia’s security



A closer look by agency: Office of Foreign Assets Control



The U.S. political transition is reflected in H1 2025 sanctions activity

- The bulk of H1 designations were made by the former administration in January.
- Moderate activity was recorded in the first months of the new Trump administration.
- Under Trump, OFAC's list decreased by 53 records largely due to the revocation of sanctions on Syria on June 30th

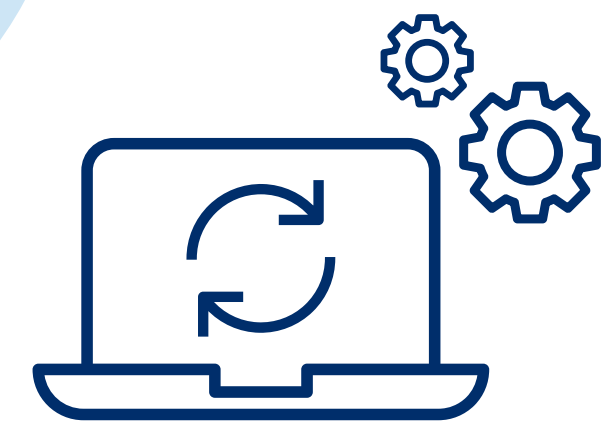


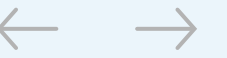
Activity:
1,960 designations
added, modified
or removed

through
54
updates...

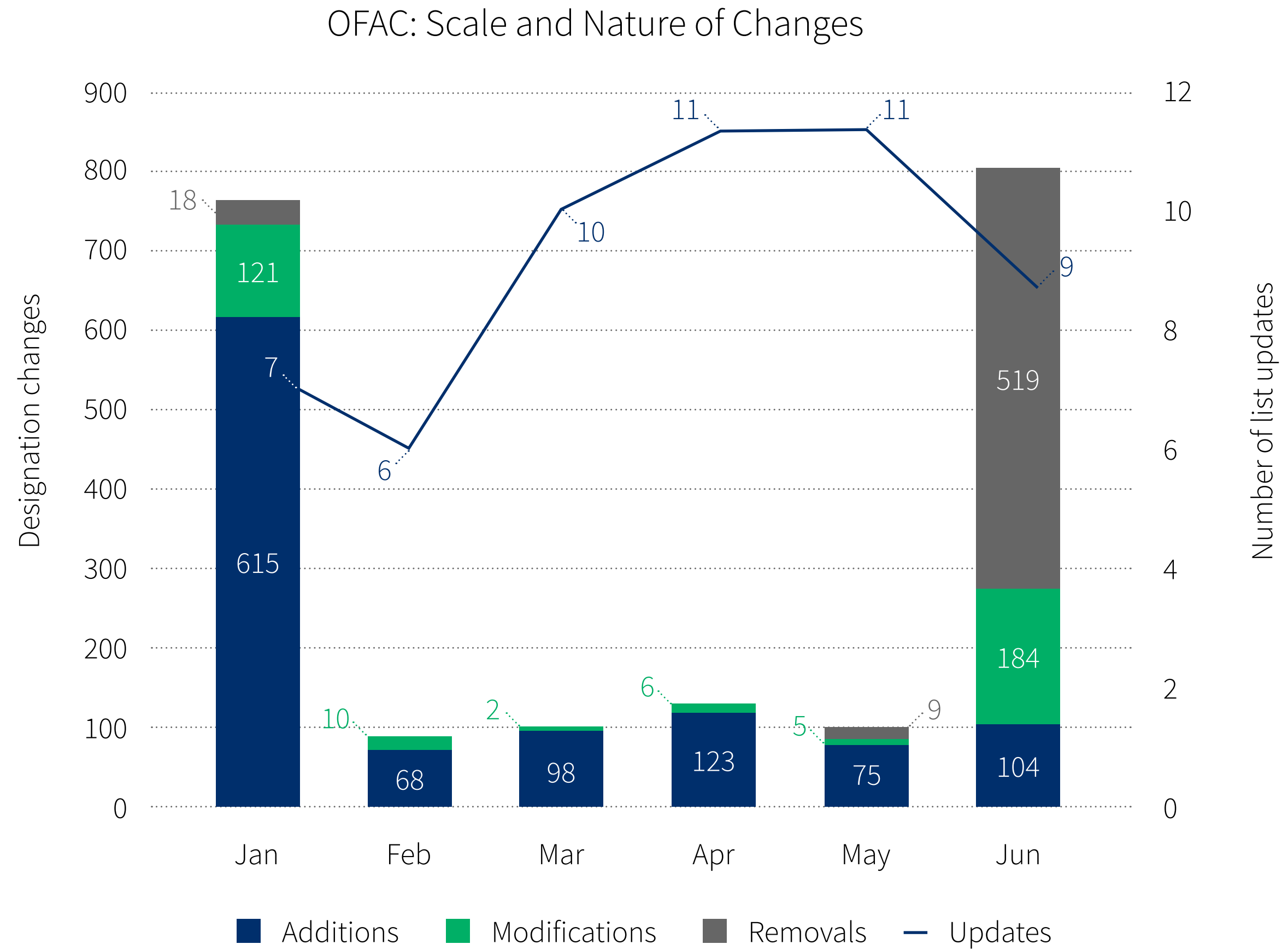


Resulting in
+ 534
net change of
designations





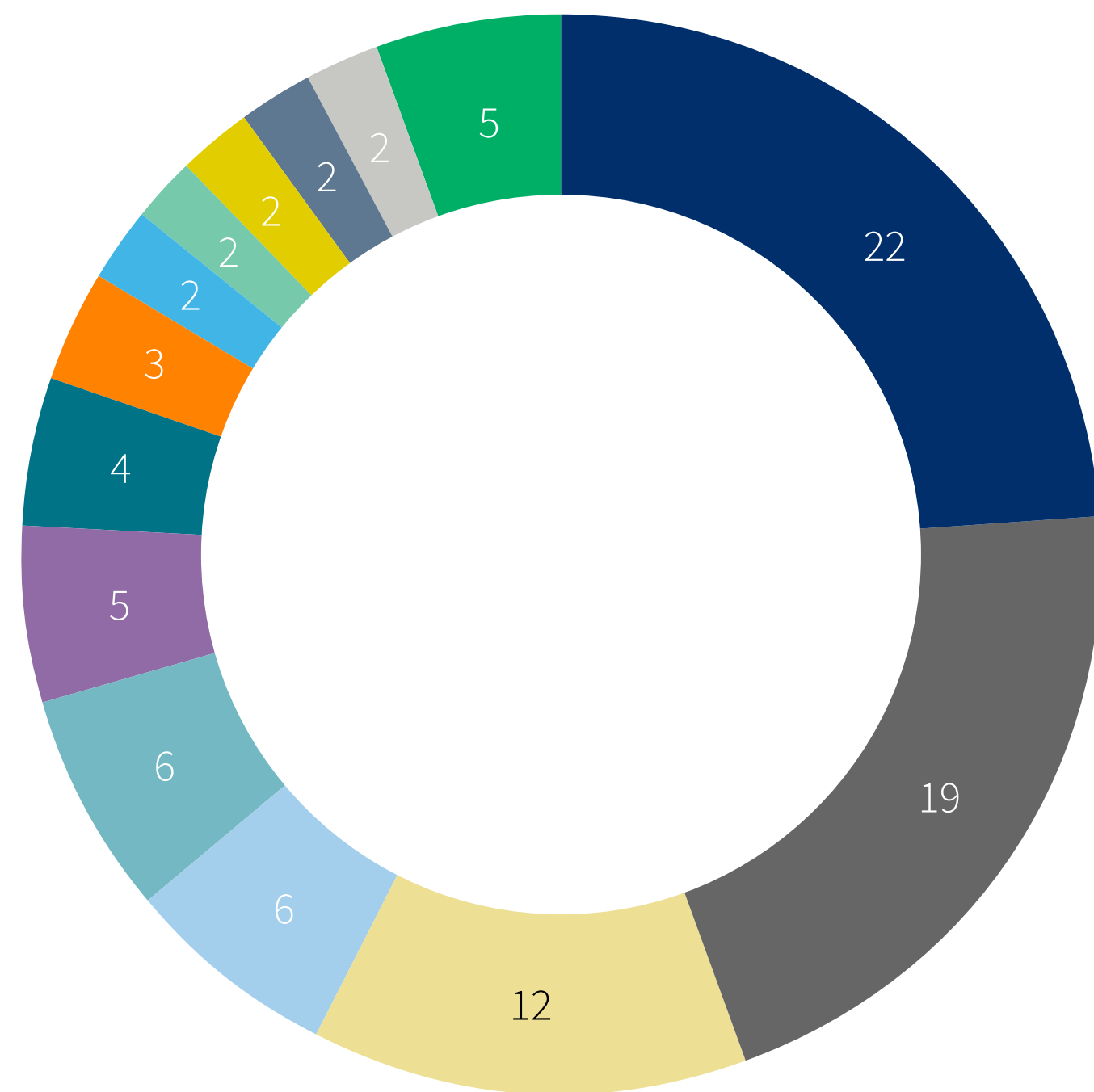
A closer look by agency: Office of Foreign Assets Control



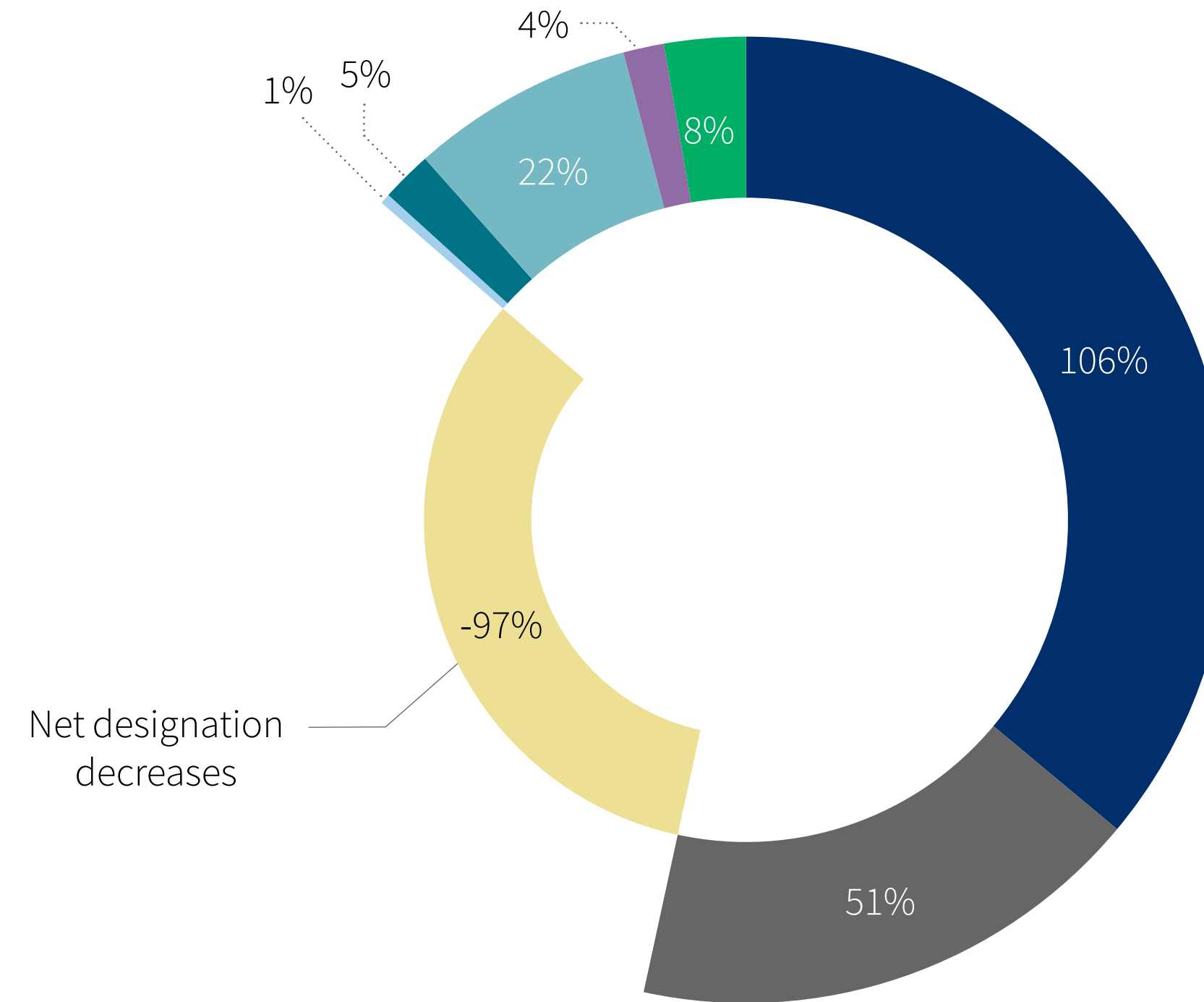


A closer look by agency: Office of Foreign Assets Control

Breakdown by number of updates*



Share of net additions by designation



- Terrorism ■ Iran ■ Narcotics ■ Cyber ■ Weapons Proliferation
- Russia ■ Organized Crime ■ Venezuela ■ Balkans ■ North Korea
- Human Rights & Corruption ■ International Criminal Court ■ Sudan ■ Others (x6)

- Russia ■ Iran ■ Syria ■ North Korea ■ Other Countries
- Terrorism ■ Narcotics ■ Other Thematic Sanctions

A closer look by agency: **Office of Foreign Assets Control**

Maximum pressure on Iran

- Disrupting Iranian oil exports
- Missiles and unmanned ariel vehicle (UAV) procurement and manufacturing activities
- Nuclear and WMD proliferation activities
- Money laundering networks and parallel financial systems

Drug cartels as terrorist organizations

- 9 cartels now sanctioned as foreign terrorist organizations (FTOs)
- +23 cartel members and controlled businesses
- FTO/Specially Designated Global Terrorist (SDGT) designation results in heightened risks, including enforcements and secondary sanctions

Focus on fraud and cybercrime

- Six updates under cyber-related Sanctions
- Targeting malicious cyber-related activities from foreign governments and groups
- Rising focus on scams and large-scale online fraud schemes
- Regular multilateral actions on cyber sanctions (UK/AUS)

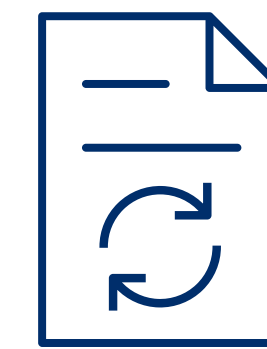


A closer look by agency: Office of Financial Sanctions Implementation



The UK applied focused pressure

- Limited activity in the first quarter (8 updates).
- The main set of designations related to the situation in Venezuela, adding 15 high-ranking officials of the Maduro regime.
- April's spike corresponds to the UK easing sanctions on Syria. The UK updated the statements of reasons for 348 Syria-related targets and lifted sanctions on 12 government-related entities.
- In May and June, the UK ramped up pressure on Russia and its evasion networks, targeting vessels comprising the Shadow Fleet.

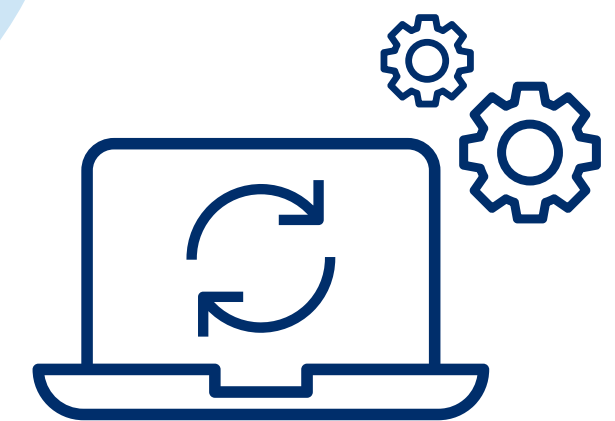


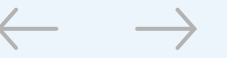
Activity:
754 designations
added, modified
or removed

through
24
updates...

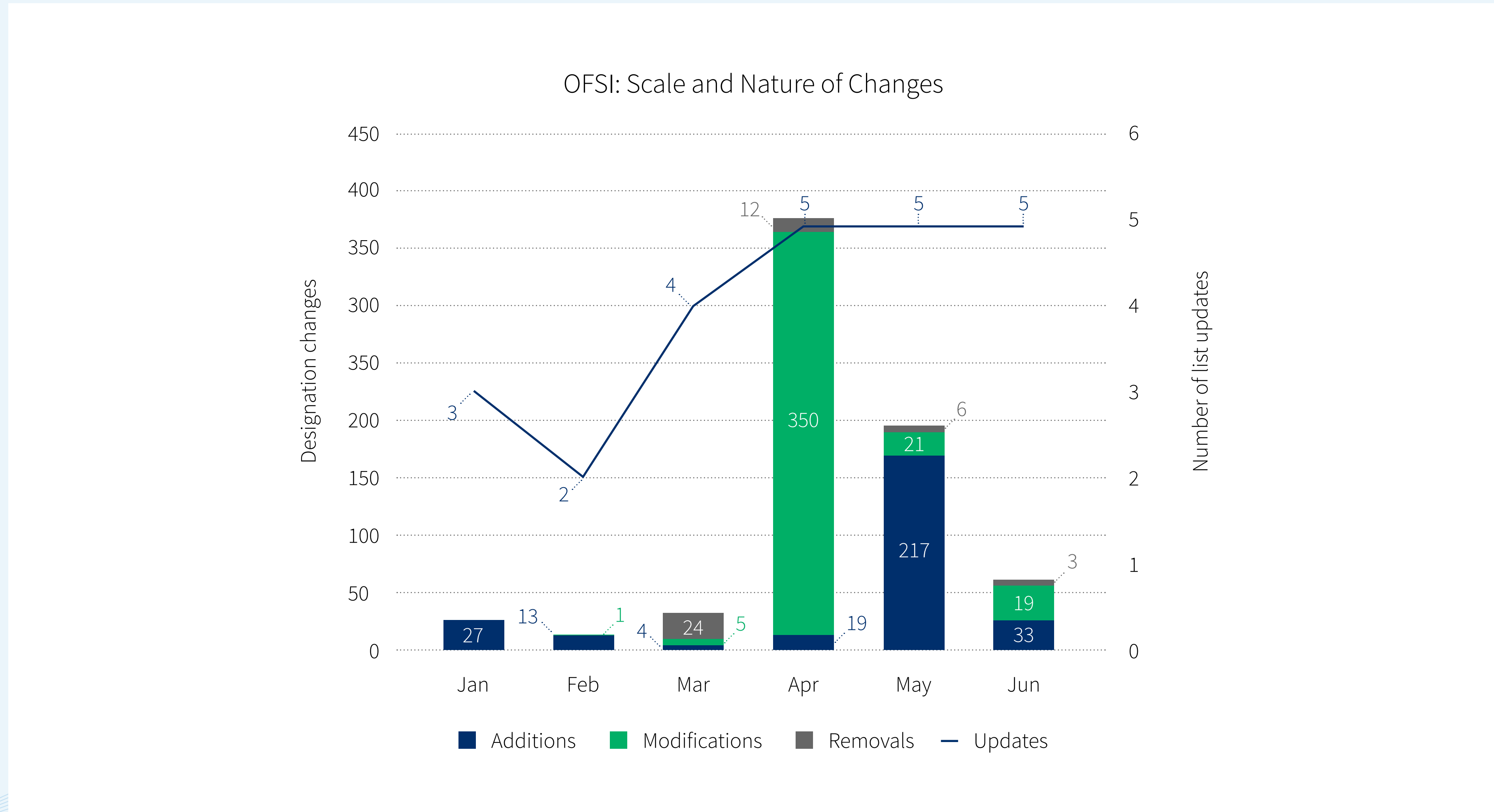
OFSI

Resulting in
+268
net change of
designations





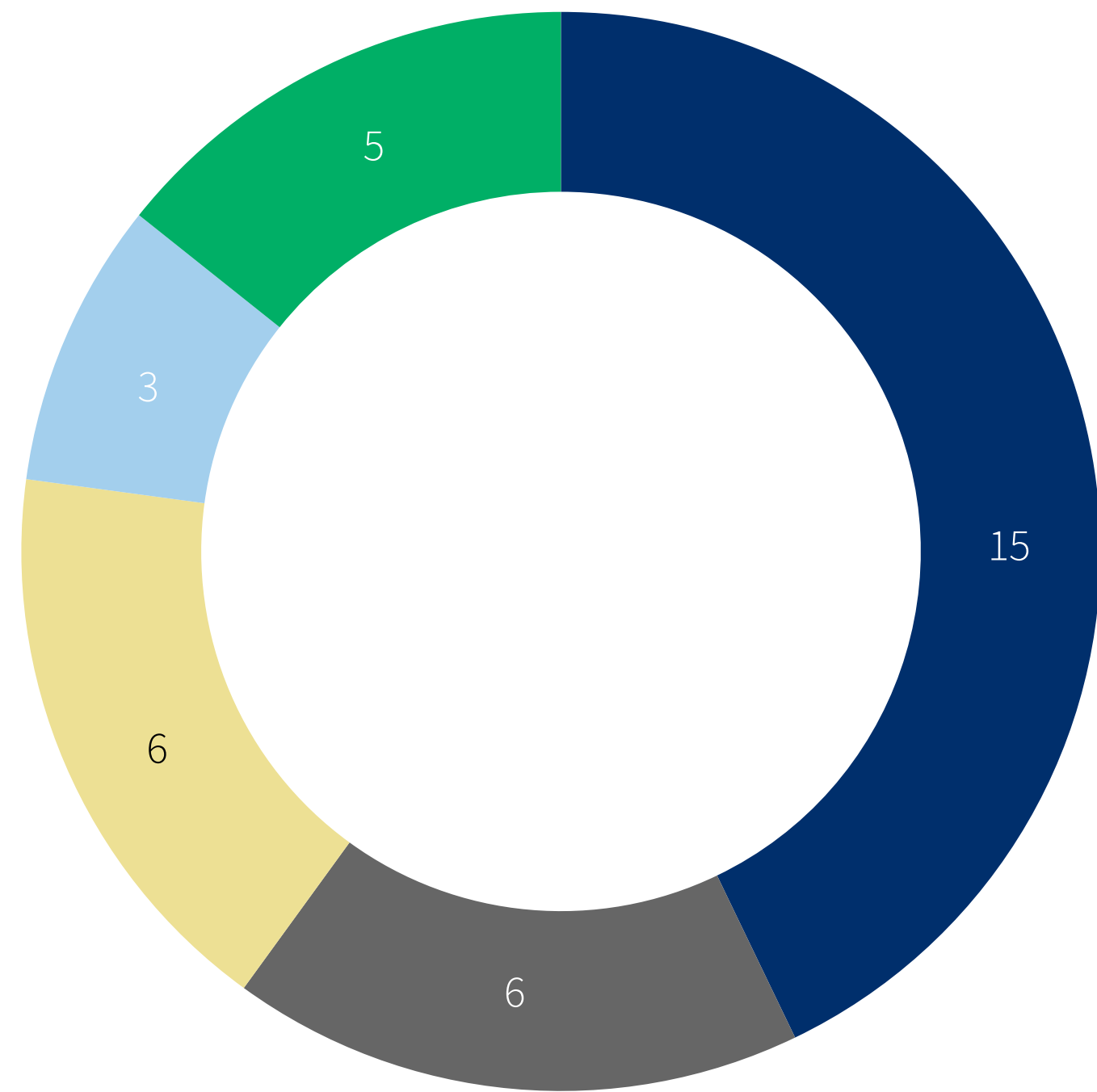
A closer look by agency: Office of Financial Sanctions Implementation





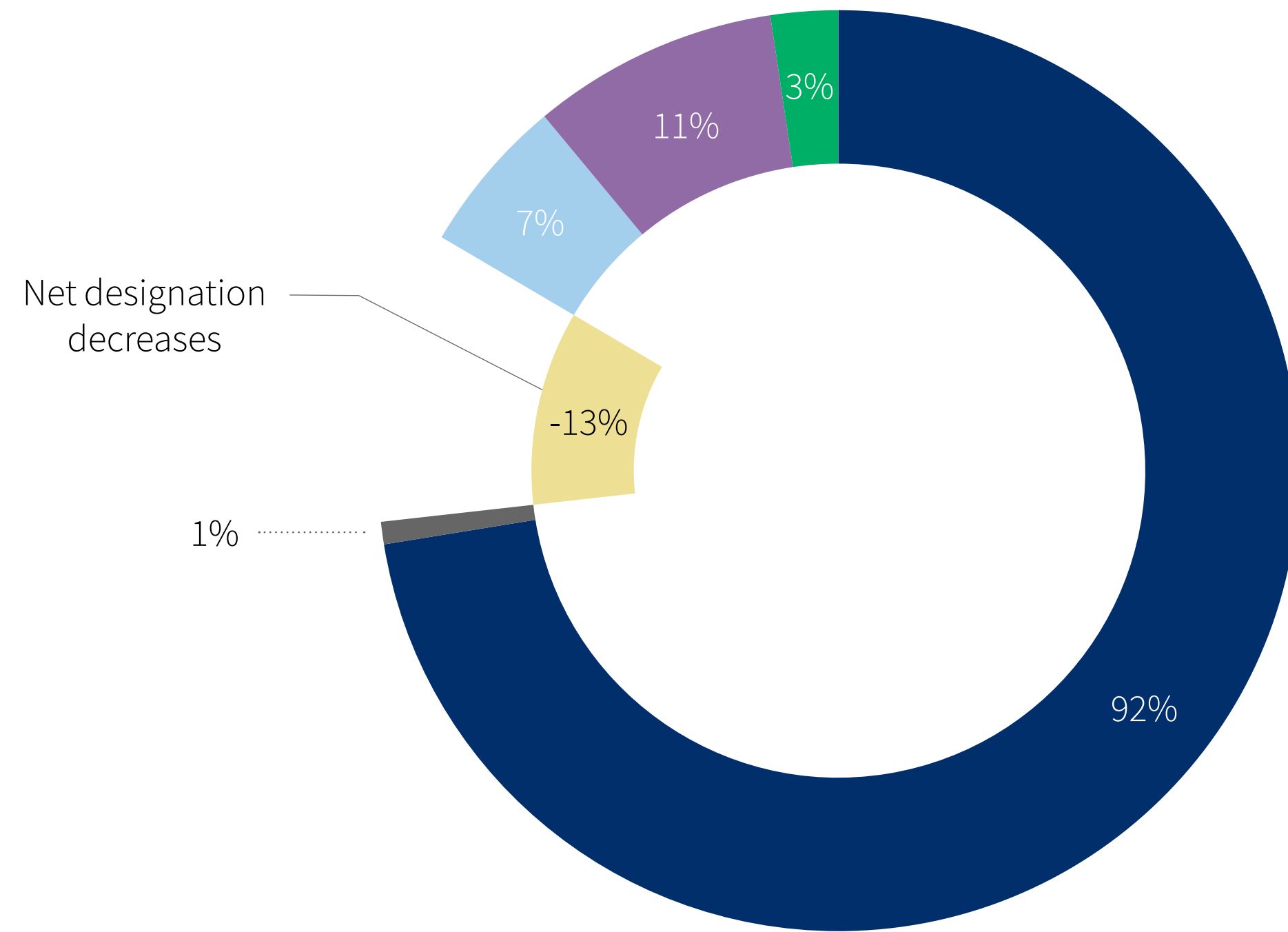
A closer look by agency: Office of Financial Sanctions Implementation

Breakdown by number of updates*



- Russia
- Terrorism
- Human Rights & Corruption
- Syria
- Others (x9)

Share of net additions by designation



- Russia
- Iran
- Syria
- Other Countries
- Human Rights & Corruption
- Other Thematic Sanctions

A closer look by agency: **Office of Financial Sanctions Implementation**

Russia: cutting oil exports

- The UK sanctioned 2 of Russia's largest oil producing companies in a coordinated action with the U.S. (Jan 10th)
- Sanctions on Russia's shadow fleet of tankers ramped up, accounting for more than 60% of total designations in H1

Global human rights and corruption

- 13 corrupt actors from Guatemala, Georgia and Moldova were sanctioned on Apr 2nd
- 2 Israeli Ministers were sanctioned for inciting violence in the West Bank (Jun 10th)

Coordinated sanctions

- With the EU for measures related to Venezuela and Guatemala
- With the U.S. and Australia for sanctions on malign cyber actors
- With Australia, Canada, New Zealand and Norway for measures targeting Israeli Ministers

Looking ahead: What to expect for H2 2025

Further sanctions on Russia

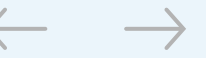
- At the time of publication, the EU is preparing its 19th package of Russian sanctions (following the 18th package release in July 2025, which the data in this eBook does not reflect). Expected measures include further targeting the Russian energy sector and shadow fleets, as well as increased willingness to leverage anti-circumvention mechanisms against countries providing prohibited goods to Russia
- The U.S. is also considering additional sanctions on Russia's shadow fleet, teasing these in an attempt to see a ceasefire imposed in the ongoing conflict in Ukraine

Widening focus

- With western economies being hit with increasing cyber attacks (often referred to as a “scamdemic”), we can expect continued cyber sanctions on large-scale fraud schemes
- Non-traditional targets are being targeted, including those involved in facilitating migrant trafficking into the UK

Enforcement activities

- OFAC enforcements are back; at the time of publication, enforcements total over \$238m, compared to \$48.8m for the whole of 2024
- The UK will publish a new enforcement strategy to increase the deterrent effect of UK sanctions and we may see the first enforcements from the new Office of Trade Sanctions Implementation (OTSI) agency
- Until now, EU member states have shown diverging effectiveness in enforcement activities. Following the Criminalization Directive coming into force, we should see a growing number of enforcements across the EU



Looking ahead: Closing thoughts

H1 2025 was another dynamic time for sanctions, although priorities diverged across the “Global West”

Notable changes in U.S. sanctions policy shifted from Russia to Iran and drug cartels. The U.S. stance toward Russia stands in contrast to the unity within the EU on further sanctions, exposing uncertainty going forward. The latest Russia-related measures have raised complexity. There is a focus on oil exports and maritime activities, specifically the use of shadow fleets to evade detection. Vessel sanctions are expected to remain an ongoing priority for the rest of the year.

Agility is key to sanctions success

Governments need to immediately implement new waves of sanctions to meet evolving threats. At the same time, the ability to adjust to shifting priorities is crucial, including lifting sanctions and normalizing relations when objectives are met.

Sanctions compliance programs need to keep pace and scale up to match sanctions objectives.

Sanctions screening is just the tip of the iceberg; it is not a silver bullet, but it is a crucial baseline control. Detecting sanctions evasion calls for additional data, advanced technology and skills for more effective due diligence.

Real-world responsiveness

The UK’s July regulations targeting illicit migration schemes highlight how sanctions are evolving to address non-traditional threats. By targeting networks involved in people smuggling and trafficking, the UK is using sanctions to disrupt criminal ecosystems and respond to destabilizing tactics. This marks a shift toward more agile, issue-driven sanctions policy.

How we can help



LexisNexis® Risk Solutions offers a suite of accurate, up-to-date data and advanced technology solutions that enable financial institutions and other organizations to mitigate sanctions-related risks.

Our advanced analytics and real-time data effectively screen individuals, entities, and transactions against global sanctions lists to help organizations comply with regulations and reduce the potential for costly compliance violations. Make informed decisions about business operations with confidence.

Contact us to learn more about how the advanced tools and technology from LexisNexis® Risk Solutions can dramatically improve sanctions screening and protect your organization.

About LexisNexis® Risk Solutions

LexisNexis® Risk Solutions harnesses the power of data, sophisticated analytics platforms and technology solutions to provide insights that help businesses across multiple industries and governmental entities reduce risk and improve decisions to benefit people around the globe. Headquartered in metro Atlanta, Georgia, we have offices throughout the world and are part of RELX (LSE: REL/NYSE: RELX), a global provider of information-based analytics and decision tools for professional and business customers. For more information, please visit [LexisNexis Risk Solutions](#) and [RELX](#).

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