

JUDGMENT OF THE GENERAL COURT (Eighth Chamber)

2 September 2026 (\*)

( Common foreign and security policy – Restrictive measures adopted in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine – Freezing of funds – List of persons, entities and bodies subject to the freezing of funds and economic resources – Maintenance of the applicant’s name on the list – Concept of ‘benefitting from a leading businessperson operating in Russia’ – Article 2(1)(g) of Decision 2014/145/CFSP – Article 3(1)(g) of Regulation (EU) No 269/2014 – Error of assessment )

In Case T-799/25,

**Galina Evgenyevna Pumpyanskaya**, residing in Dubai (United Arab Emirates), represented by A. Saccucci and F. Ciancio, lawyers,

applicant,

v

**Council of the European Union**, represented by S. Van Overmeire and D. Yovanof, acting as Agents, and by B. Maingain, lawyer,

defendant,

THE GENERAL COURT (Eighth Chamber),

composed of I. Gâlea, President, T. Tóth (Rapporteur) and L. Spangsberg Grønfeldt, Judges,

Registrar: V. Di Bucci,

having regard to the written part of the procedure,

having regard to the fact that no request for a hearing was submitted by the parties within three weeks after service of notification of the close of the written part of the procedure, and having decided to rule on the action without an oral part of the procedure, pursuant to Article 106(3) of the Rules of Procedure of the General Court,

gives the following

**Judgment**

- 1 By her action pursuant to Article 263 TFEU, the applicant, Ms Galina Evgenyevna Pumpyanskaya, seeks annulment of (i) Council Decision (CFSP) 2025/1895 of 12 September 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, 2025/1895) and Council Implementing Regulation (EU) 2025/1894 of 12 September 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, 2025/1894); and (ii) Council Decision (CFSP) 2026/696 of 14 March 2026 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, 2026/696) and Council Implementing Regulation (EU) 2026/695 of 14 March 2026 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, 2026/695), in so far as those acts (together, ‘the contested acts’) maintain her name on the lists annexed to those acts.

### **Background to the dispute and events subsequent to the bringing of the action**

- 2 The present case has been brought in the context of the restrictive measures adopted by the European Union in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.
- 3 The applicant is a Russian national.
- 4 On 17 March 2014, the Council of the European Union adopted, on the basis of Article 29 TEU, Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine (OJ 2014 L 78, p. 16). On the same date, it adopted, on the basis of Article 215(2) TFEU, Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine (OJ 2014 L 78, p. 6).
- 5 By way of Council Decision (CFSP) 2022/397 of 9 March 2022 amending Decision 2014/145 (OJ 2022 L 80, p. 31) and Council Implementing Regulation (EU) 2022/396 of 9 March 2022 implementing Regulation (EU) No 269/2014 (OJ 2022 L 80, p. 1), the applicant’s name was added to the list annexed to Decision 2014/145 and to that set out in Annex I to Regulation No 269/2014, respectively (‘the lists at issue’).
- 6 On 14 September 2022, 13 March 2023, 13 September 2023, 12 March 2024, 12 September 2024 and 14 March 2025, the Council decided to maintain the applicant’s name on the lists at issue until 15 March 2023, 15 September 2023, 15 March 2024, 15 September 2024, 15 March 2025 and 15 September 2025, respectively.
- 7 Article 2 of Decision 2014/145, in the version amended by Decision (CFSP) 2023/1094 of 5 June 2023 (OJ 2023 L 146, p.20), provides as follows:  
  
‘1. All funds and economic resources belonging to, or owned, held or controlled by:  
  
...  
  
(g) leading businesspersons operating in Russia and their immediate family members, or other natural persons, benefitting from them, or businesspersons, legal persons, entities or bodies involved in economic sectors providing a substantial source of revenue to the Government of the Russian Federation, which is responsible for the annexation of Crimea and the destabilisation of Ukraine ...’
- 8 By its judgment of 6 September 2023, *Pumpyanskaya v Council* (T-272/22, not published, EU:T:2023:491), the Court dismissed the action concerning the acts referred to in paragraph 5 above.
- 9 By its judgment of 26 June 2024, *Pumpyanskaya v Council* (T-737/22, not published, EU:T:2024:417), the Court annulled the acts of 14 September 2022 and 13 March 2023, in so far as they concerned the applicant.
- 10 By its judgment of 2 April 2025, *Pumpyanskaya v Council* (T-1108/23, not published, EU:T:2025:348), the Court annulled the acts of 13 September 2023, 12 March 2024 and 12 September 2024, in so far as they concerned the applicant.

- 11 On 13 May 2025, the Council adopted Decision (CFSP) 2025/904 amending Decision 2014/145 (OJ L, 2025/904), and Regulation (EU) 2025/903 amending Regulation No 269/2014 (OJ L, 2025/903), in order, inter alia, to amend the criteria according to which natural or legal persons, entities or bodies could be subject to the restrictive measures at issue.
- 12 Article 2b of Decision 2014/145, in the version amended by Decision 2025/904, provides as follows:
- ‘Leading businesspersons operating in Russia listed in the Annex pursuant to Article 1(1), point (e), and Article 2(1), point (g), who claim to have transferred ownership, control or economic benefit of their business interests on or after 24 February 2022 shall continue to be considered as leading businesspersons and maintained in the list set out in the Annex, unless sufficient, recent and reliable information demonstrates that they no longer meet the criteria set out in Article 1(1), point (e), and Article 2(1), point (g).’
- 13 On 12 September 2025, the Council adopted the seventh set of maintaining acts, namely Decision 2025/1895 and Implementing Regulation 2025/1894, which extended the restrictive measures taken against the applicant until 15 March 2026, for the following reasons:
- ‘[The applicant] is the spouse of [Mr] Dmitry [Alexandrovich] Pumpyansk[i]y, a leading Russian businessperson and President of the Sverdlovsk regional Union of Industrialists and Entrepreneurs (SOSPP).
- Her husband is the co-Chairman of the RSPP Committee on Industrial Policy and Technical Regulation, now Committee on Technical Regulation. He is also former Chairman of the Board of Directors of [TMK], and former President and board member of Group Sinara. Both companies support and benefit from cooperation with authorities of the Russian Federation and State-owned enterprises, including Russian railways, Gazprom and Rosneft.
- Despite her claims that she “unconditionally and irrevocably retired” from her charitable activities in the Sinara Charitable Foundation in January 2023, [the applicant] was still presented as Chairman of the Board of Trustees of the Foundation well beyond that date, thus maintaining exposure to public and business activities.
- [The applicant] is therefore an immediate family member benefitting from her husband [Mr] Dmitry [Alexandrovich] Pumpyansk[i]y.’
- 14 By its judgment of 15 October 2025, *Pumpyanskaya v Council* (T-235/25, not published, EU:T:2025:957), the Court annulled the acts of 14 March 2025, in so far as they concerned the applicant.
- 15 On 14 March 2026, the Council adopted the eighth set of maintaining acts, namely Decision 2026/696 and Implementing Regulation 2026/695, which extended the restrictive measures taken against the applicant until 15 September 2026, without modifying the reasons for including her name on the lists at issue compared with those contained in the seventh set of maintaining acts referred to in paragraph 13 above.

### **Forms of order sought**

- 16 Following modification of the application, the applicant claims, in essence, that the Court should:
- declare the inapplicability, as regards the applicant’s husband, of (i) Article 2(1)(f) of Decision 2014/145, as amended by Council Decision (CFSP) 2022/329 of 25 February 2022 (OJ 2022 L 50, p.1), and Article 3(1)(f) of Regulation No 269/2014, as amended by Council Regulation (EU) 2022/330 of 25 February 2022 (OJ 2022 L 51, p.1); (ii) the first and third parts of Article 2(1)(g) of Decision 2014/145, as amended by Decision 2023/1094, and of Article 3(1)(g) of Regulation No 269/2014, as amended by Council Regulation (EU) 2023/1089 of 5 June 2023 (OJ 2023 L 146,

p.1); and (iii) Article 2b of Decision 2014/145, as amended by Decision 2025/904, and Article 3(1b) of Regulation 269/2014, as amended by Regulation 2025/903;

- declare the inapplicability, as regards the applicant, of the second part of Article 2(1)(g) of Decision 2014/145, as amended by Decision 2023/1094, and of Article 3(1)(g) of Regulation No 269/2014, as amended by Regulation 2023/1089;
- annul the contested acts in so far as they concern the applicant;
- order the Council to pay the costs.

17 Following its observations on the modification of the application, the Council contends, in essence, that the Court should:

- dismiss as inadmissible the plea of illegality raised by the applicant concerning Article 2(1)(f) of Decision 2014/145, as amended by Decision 2022/329; the first and third parts of Article 2(1)(g) of Decision 2014/145, as amended by Decision 2023/1094; Article 3(1)(g) of Regulation No 269/2014, as amended by Regulation 2023/1089; and Article 2b of Decision 2014/145, as amended by Decision 2025/904, respectively;
- dismiss the action;
- order the applicant to pay the costs;
- in the alternative, in the event that the Court annuls the contested acts in so far as the name of the applicant has been included in the list at issue in Annex I to Decision 2014/145, as amended order, in essence, that the effects of Decision 2025/1895 and Decision 2026/696 be maintained in relation to the applicant until the partial annulment of Implementing Regulation 2025/1894 and Implementing Regulation 2026/695 takes effect.

## **Law**

18 In support of her action, the applicant raises, in essence, five pleas in law, alleging: (i) an error of assessment; (ii) an infringement of the rights of the defence and the right to effective judicial protection; (iii) an infringement of the duty to state reasons; (iv) an infringement of fundamental rights; and (v) the illegality under Article 277 TFEU of the listing criteria relied upon in the contested acts.

19 The Court considers it appropriate to begin by examining the first plea in law, alleging an error of assessment.

### ***The first plea in law, alleging an error of assessment***

20 In essence, the applicant submits that, in the contested acts, the Council made a manifest error of assessment in so far as her name was maintained on the lists at issue on the basis of the criterion designating persons who benefit from a leading businessperson operating in Russia, laid down in the second part of Article 1(1)(e) and of Article 2(1)(g) of Decision 2014/145, as amended by Decision 2023/1094 ('the second part of the amended (g) criterion').

### ***Preliminary observations***

21 It should be noted that the first plea in law must be regarded as alleging an error of assessment rather than a manifest error of assessment. While it is true that the Council has a degree of discretion to determine, on a case-by-case basis, whether the legal criteria on which the restrictive measures at issue are based are satisfied, the fact remains that the Courts of the European Union must ensure the review – in principle the full review – of the legality of all acts of the European Union (see, to that effect, judgments of 3 July 2014,

*National Iranian Tanker Company v Council*, T-565/12, EU:T:2014:608, paragraphs 54 and 55, and of 26 October 2022, *Ovsyannikov v Council*, T-714/20, not published, EU:T:2022:674, paragraph 61 and the case-law cited).

- 22 The effectiveness of the judicial review guaranteed by Article 47 of the Charter of Fundamental Rights of the European Union requires, in particular, that the Courts of the European Union ensure that the decision by which restrictive measures were adopted or maintained, which affects the person or entity concerned individually, is taken on a sufficiently solid factual basis. That entails a verification of the factual allegations in the summary of reasons underpinning that decision, with the consequence that judicial review cannot be restricted to an assessment of the cogency in the abstract of the reasons relied on, but must concern whether those reasons, or, at the very least, one of those reasons, deemed to be sufficient in itself to support that decision, is substantiated (see, to that effect, judgments of 18 July 2013, *Commission and Others v Kadi*, C-584/10 P, C-593/10 P and C-595/10 P, EU:C:2013:518, paragraph 119, and of 26 October 2022, *Ovsyannikov v Council*, T-714/20, not published, EU:T:2022:674, paragraph 62).
- 23 That assessment must be carried out by examining the evidence and information not in isolation but in their context. The Council discharges the burden of proof borne by it if it presents to the Courts of the European Union a sufficiently concrete, precise and consistent body of evidence to establish that there is a sufficient link between the person or entity subject to a measure freezing that person's funds and the regime or, in general, the situations, being combated (see judgment of 20 July 2017, *Badica and Kardiam v Council*, T-619/15, EU:T:2017:532, paragraph 99 and the case-law cited; see, to that effect, judgment of 26 October 2022, *Ovsyannikov v Council*, T-714/20, not published, EU:T:2022:674, paragraphs 63 and 66).
- 24 It is the task of the competent EU authority to establish, in the event of challenge, that the reasons relied on against the person or entity concerned are well founded, and not the task of that person or entity to adduce evidence of the negative, that those reasons are not well founded. For that purpose, there is no requirement that the Council produce before the Courts of the European Union all the information and evidence underlying the reasons alleged in the act of which annulment is sought. It is necessary that the information or evidence produced should support the reasons relied on against the person or entity concerned (judgments of 18 July 2013, *Commission and Others v Kadi*, C-584/10 P, C-593/10 P and C-595/10 P, EU:C:2013:518, paragraphs 121 and 122, and of 28 November 2013, *Council v Fulmen and Mahmoudian*, C-280/12 P, EU:C:2013:775, paragraphs 66 and 67; see, also, judgment of 1 June 2022, *Prigozhin v Council*, T-723/20, not published, EU:T:2022:317, paragraph 73 and the case-law cited).
- 25 In such a scenario, the Courts of the European Union must then determine whether the facts alleged are made out in the light of that information or evidence and assess the probative value of that information or evidence in the circumstances of the particular case and in the light of any observations submitted in relation to them by, among others, the person or entity concerned (see, to that effect, judgment of 18 July 2013, *Commission and Others v Kadi*, C-584/10 P, C-593/10 P and C-595/10 P, EU:C:2013:518, paragraph 124).
- 26 As regards, more specifically, the review of legality carried out with regard to the acts which maintain the name of the person concerned on the lists at issue, it should be pointed out that restrictive measures are measures of a precautionary and, by definition, provisional nature, the validity of which always depends on whether the factual and legal circumstances which led to their adoption continue to apply and on the need to persist with them in order to achieve their objective. Thus, when periodically reviewing those measures, it is for the Council to carry out an updated assessment of the situation and to take stock of the effects of those measures, with a view to determining whether they have made it possible to achieve the objectives pursued by the initial inclusion of the names of the persons and entities concerned on the list at issue or whether it is still possible to reach the same conclusion in relation to those persons and entities (see, to that effect, judgment of 27 April 2022, *Ilunga Luyoyo v Council*, T-108/21, EU:T:2022:253, paragraph 55 and the case-law cited; judgment of 26 October 2022, *Ovsyannikov v Council*, T-714/20, not published, EU:T:2022:674, paragraph 67).

- 27 It follows that, in order to justify maintaining a person's name on a list of persons and entities subject to restrictive measures, the Council is not prohibited from basing its decision on the same evidence as that which justified the initial inclusion, the re-inclusion or a previous maintenance of the applicant's name on that list, provided that (i) the reasons for listing remain unchanged and (ii) the context has not changed in such a way that that evidence is now out of date (see, to that effect, judgment of 23 September 2020, *Kaddour v Council*, T-510/18, EU:T:2020:436, paragraph 99). On that basis, assessment of the changes in the context involves taking into consideration, first, the situation in the country in respect of which the system of restrictive measures was established and the particular situation of the person concerned (see, to that effect, judgments of 23 September 2020, *Kaddour v Council*, T-510/18, EU:T:2020:436, paragraph 101, and of 26 October 2022, *Ovsyannikov v Council*, T-714/20, not published, EU:T:2022:674, paragraph 78), and, second, all the relevant circumstances and, in particular, the fact that the objectives pursued by the restrictive measures have not been achieved (see, to that effect, judgment of 27 April 2022, *Ilunga Luyoyo v Council*, T-108/21, EU:T:2022:253, paragraph 56; see also, to that effect and by analogy, judgment of 12 February 2020, *Amisi Kumba v Council*, T-163/18, EU:T:2020:57, paragraphs 82 to 84 and the case-law cited).
- 28 It is therefore in the light of those preliminary observations that it is necessary to ascertain whether the Council made an error of assessment in deciding to maintain the applicant's name on the lists at issue by way of the adoption of the contested acts.
- 29 In the present case, it should be noted that, by way of the contested acts, the Council decided to maintain the applicant's name on the lists at issue on the basis of the ground that she is an immediate family member of, and benefits from, a 'leading businessperson', namely her husband, Mr Dmitry Alexandrovich Pumpyanskiy, which corresponds to the second part of the amended (g) criterion.
- 30 The applicant claims, in essence, first, that she is no longer an 'immediate family member' of her husband, within the meaning of the second part of the amended (g) criterion, as a result of their separation and the fact that she now lives in Dubai (United Arab Emirates); second, that she does not in any way benefit from her husband; third, that she is financially independent of him as a result of the sale of the shares that she held in Group Sinara; and, fourth, that the Council made an error of assessment in finding that her husband was a 'leading businessperson' for the purposes of the second part of the amended (g) criterion.
- 31 The Council disputes the applicant's arguments. In essence, it submits that, even assuming that she is, as she claims, separated from her husband, the fact remains that they are still married and that the conditions for applying the second part of the amended (g) criterion are satisfied. It further argues, in essence, that the financial resources on which the applicant now claims to base her economic independence do not in any way derive from independent activity but from the sale of the shares that she held in Group Sinara as a result of her family and professional ties with her husband. The Council also claims that Mr Pumpyanskiy can be classified as a 'leading [businessperson] operating in Russia' for the purposes of that criterion and that it therefore correctly found that the applicant's name should be maintained on the lists at issue.
- 32 In the present case, it must be stated that it is clear from the grounds of the contested acts that the factual basis of the ground relied on in respect of the applicant, which relates to the second part of the amended (g) criterion and purportedly allows a finding that she benefits from her husband, refers only to, first, his current or past positions within two bodies, namely the Russian Union of Industrialists and Entrepreneurs (RSPP) and the Sverdlovsk regional Union of Industrialists and Entrepreneurs (SOSPP), second, her husband's former positions within the company TMK and Group Sinara and, third, the fact that the applicant was still presented as Chairman of the Board of Trustees of the Sinara Charitable Foundation, which allows her to maintain exposure to public and business activities (see paragraph 13 above).
- 33 Accordingly, given that the grounds for listing indicate a link between the applicant and her husband's positions referred to in paragraph 32 above, it is necessary to determine whether the factual basis relied on by the Council contains anything to demonstrate that those positions are such as to constitute benefitting from her husband for the purposes of the second part of the amended (g) criterion.

- 34 In that connection, it should be stated that, according to the case-law, the concept of ‘benefitting’, within the meaning of the second part of the amended (g) criterion, must be interpreted in the light of the objectives referred to in that criterion, which involve increasing the costs of the actions of the Russian Federation seeking to undermine Ukraine’s territorial integrity, sovereignty and independence. Accordingly, benefitting within the meaning of that provision refers to any benefit of any kind, which is not necessarily undue, but which must be quantitatively or qualitatively not insignificant. It may therefore be a financial or non-financial benefit, such as a donation, a transfer of funds or economic resources, an intervention in order to promote the award of public contracts, an appointment or a promotion (judgments of 11 September 2024, *Tokareva v Council*, T-744/22, EU:T:2024:608, paragraph 142, and of 11 September 2024, *Ezubov v Council*, T-741/22, not published, EU:T:2024:605, paragraph 185).
- 35 In the first place, as regards the applicant’s husband’s current and past positions within the two organisations referred to in paragraph 32 above or those held within the company TMK and Group Sinara, suffice it to note that these constitute a contextual element from which the Council attempts to substantiate the status of the applicant’s husband as a leading businessperson. Nevertheless, reference to those positions is not capable of demonstrating by itself that the applicant benefits from her husband under the second part of the amended (g) criterion.
- 36 In the second place, as regards the ground that the applicant was still presented as Chairman of the Board of Trustees of the Sinara Charitable Foundation, which allows her to maintain exposure to public and business activities, it is apparent from the file bearing the reference WK 9180/2025 INIT that, in July 2024, at the time of a visit by a senior official of the United Nations (UN) to the National Carpet Museum in Baku (Azerbaijan), that official was welcomed, among others, by the applicant, presented on the website of that museum (Exhibits Nos 2 and 3) and on its Instagram account (Exhibit No 1) as the Chairman of the Board of Trustees of the Sinara Charitable Foundation.
- 37 First, such a situation cannot in any way amount to exposure to business activities, as stated in the grounds for listing. Second, it must be noted that a single public appearance by the applicant, in a cultural context, is not capable of demonstrating that she derived a qualitatively or quantitatively not insignificant benefit from her husband, for the purposes of the second part of the amended (g) criterion.
- 38 In that regard, the Council’s argument that the fact that the applicant was still presented as Chairman of the Board of Trustees of the Sinara Charitable Foundation contributes to maintaining, in the eyes of third parties, the association of the applicant with a structure closely linked to her husband’s economic activities cannot succeed.
- 39 First, it is clear that the applicant’s name was maintained on the lists at issue on the basis of the second part of the amended (g) criterion, which allows for the inclusion on those lists of the names of immediate family members or other persons who benefit from leading businesspersons operating in Russia, and not on the basis of the association criterion. Second, the Council cannot validly imply that the applicant is linked to the economic activities of her husband by Group Sinara when it is apparent from the grounds that the Council is of the view that the applicant’s husband no longer holds his position in Group Sinara. Lastly, third and in any event, it must be stated that, even if the fact of being presented in July 2024 as Chairman of the Board of Trustees of the Sinara Charitable Foundation were to be regarded as benefitting from her husband, the Council would still have needed to demonstrate that there remained such a benefit at the time that the contested acts were adopted.
- 40 In the light of the foregoing, the applicant is therefore correct in claiming that the factual basis on which the Council relied was insufficient to demonstrate that, at the time the contested acts were adopted, she was benefitting from her husband’s current or past positions for the purposes of the second part of the amended (g) criterion.
- 41 That finding cannot be called into question by the Council’s arguments, first, that even though the applicant claims to live in Dubai, she is still married to Mr Pumpyanskiy and, second, the financial resources on which the applicant now claims to base her economic independence do not in any way derive

from an independent activity but from the sale of shares that she held in Group Sinara as a result of her family and professional ties with her husband.

42 Irrespective of whether or not the applicant lives in Dubai and of whether or not she and Mr Pumpyanskiy are still married, it must be pointed out that the fact that her financial resources derive from the sale of shares that she held in Group Sinara, as a result of her family and professional ties with her husband, is not mentioned in the grounds for listing in the contested acts. Accordingly, unless a substitution of grounds is admitted, the Council cannot be permitted to rely on that fact to establish that those acts are well founded.

43 It follows from the foregoing that the Council has not discharged the burden of proof incumbent on it in order to establish that the applicant benefited from a leading businessperson operating in Russia, for the purposes of the second part of the amended (g) criterion, as a result of the positions held by her husband referred to in the grounds of the contested acts.

44 The first plea in law must therefore be upheld and the contested acts annulled in so far as those acts concern the applicant, without it being necessary to examine the other pleas for annulment raised in support of the action or the first and second heads of claim.

### *The effects of the annulment of the contested acts*

45 The Council requests, in essence, that the Court, in the event that it annuls the contested acts in so far as they concern the applicant, order that the effects of Decision 2025/1895 and those of Decision 2026/696 be maintained in respect of the applicant until the partial annulment of Implementing Regulation 2025/1894 and Implementing Regulation 2026/695 enters into force.

46 In that connection, as regards the request that the effects of Decision 2025/1895 be maintained, it is sufficient to note that Decision 2025/1895 was effective only until 15 March 2026. Consequently, the annulment of that decision by the present judgment has no effect on the period after that date, with the result that it is not necessary to rule on the question of maintaining the effects of that decision (see, to that effect, judgment of 21 December 2021, *Klymenko v Council*, T-195/21, EU:T:2021:925, paragraph 113 and the case-law cited).

47 As to the Council's request that the effects of Decision 2026/696 be maintained until the expiry of the period allowed for bringing an appeal against the present judgment, and, in case of an appeal, until the decision ruling on that appeal, it must be recalled that, as regards Implementing Regulation 2026/695, under the second paragraph of Article 60 of the Statute of the Court of Justice of the European Union, by way of derogation from Article 280 TFEU, decisions of the General Court declaring a regulation to be void are to take effect only as from the date of expiry of the period for bringing an appeal referred to in the first paragraph of Article 56 of that Statute or, if an appeal has been brought within that period, as from the date of dismissal of that appeal.

48 In those circumstances, in the absence of an appeal, the Council has a period of two months, extended on account of distance by a period of 10 days, as from the notification of the present judgment, to adopt, if appropriate, new restrictive measures concerning the applicant.

49 By contrast, as regards Decision 2026/696, it should be noted that, in principle, the annulment thereof should lead to the removal of the applicant's name from the list in question in Annex I to Decision 2014/145, as amended.

50 However, it must be borne in mind that, under Article 264 TFEU, the Court may, if it considers this necessary, state which of the effects of the act which it has declared void are to be considered as definitive.

51 In the present case, a difference between the date when the annulment of Implementing Regulation 2026/695 takes effect, on the one hand, and that of Decision 2026/696, on the other hand, would be liable seriously to jeopardise legal certainty, since those four acts impose identical measures on the applicant

(see, to that effect, judgment of 28 September 2022, *LAICO v Council*, T-627/20, not published, EU:T:2022:590, paragraph 106).

52 It follows that the effects of Decision 2026/696 must be maintained with regard to the applicant, until the date of expiry of the period for bringing an appeal or, if an appeal is brought within that period, until any dismissal of the appeal.

### Costs

53 Under Article 134(1) of the Rules of Procedure of the General Court, the unsuccessful party is to be ordered to pay the costs if they have been applied for in the successful party's pleadings.

54 In the present case, since the Council has been unsuccessful, it must be ordered to bear its own costs and to pay those of the applicant, in accordance with the form of order sought by the applicant.

On those grounds,

THE GENERAL COURT (Eighth Chamber),

hereby:

- 1. Annuls Council Decision (CFSP) 2025/1895 of 12 September 2025 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, Council Implementing Regulation (EU) 2025/1894 of 12 September 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, Council Decision (CFSP) 2026/696 of 14 March 2026 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine and Council Implementing Regulation (EU) 2026/695 of 14 March 2026 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, in so far as the name of Ms Galina Evgenyevna Pumpyanskaya was maintained on the list of persons, entities and bodies to which those restrictive measures apply;**
- 2. Orders that the effects of Decision 2026/696 be maintained with regard to Ms Pumpyanskaya until the date of expiry of the period for bringing an appeal or, if an appeal is brought within that period, until any dismissal of the appeal;**
- 3. Orders the Council of the European Union to bear its own costs and to pay those incurred by Ms Pumpyanskaya.**

Gâlea

Tóth

Spangsberg Grønfeldt

Delivered in open court in Luxembourg on 2 September 2026.

V. Di Bucci

S. Papasavvas

Registrar

President