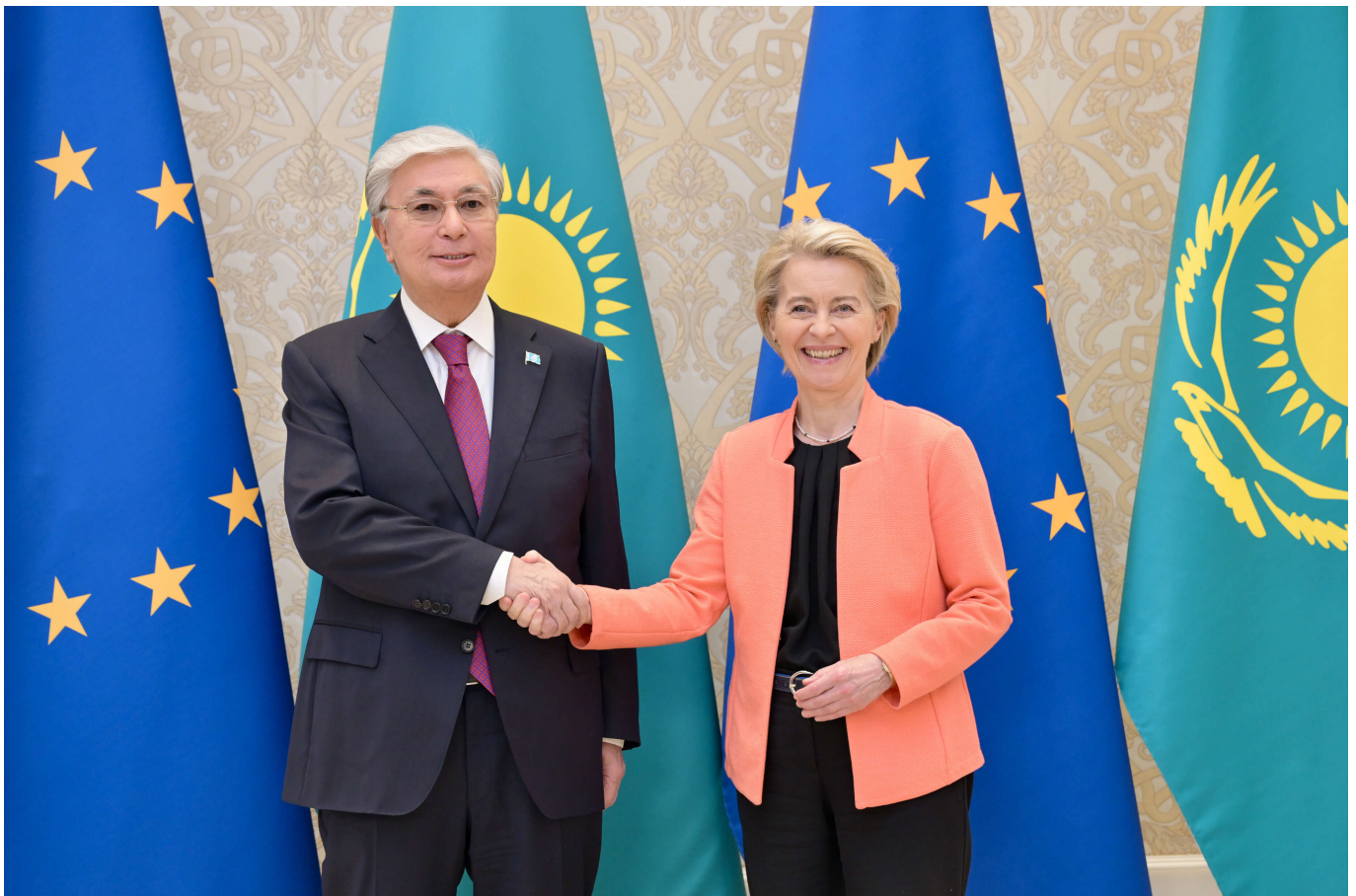




By: Tomorrow's Affairs Staff

Exemption of Kazakhstan from EU sanctions—pragmatic capitulation or controlled flexibility?



On 29 July, the European Union formally **permitted** the transit of Kazakhstan's coal through Russian ports to EU member states as part of the 18th sanctions **package** against Russia.

This was an exception to the regulation that previously categorically prohibited the use of Russian logistics infrastructure for the needs of the European market.

The decision was made at the direct request of Kazakhstan's government and after several months of negotiations between Brussels and Astana.

This is the first documented case of the Union amending the existing energy sanctions regime, not because of the direct need for Russian energy products, but because of the unsustainability of the supply chain passing through Russia. The decision is of a technical nature, but the consequences are strategic.

Kazakhstan's coal that is exported to the EU is **transported** through Russia by rail and ship.

The bans **introduced** in February 2024 (the 16th sanctions package) have effectively broken this chain.

There was no alternative corridor with sufficient capacity to replace Russian ports such as Ust-Luga or Novorossiysk.

Exemption allows Kazakh coal to reach the EU

Between February and July 2025, Kazakhstan had to contend with a decline in exports to the EU and considerable logistical losses.

During this period, the Kazakh authorities launched a diplomatic offensive towards the European Commission, requesting a functional exemption from the existing bans.

After a series of technical negotiations, the EU granted the exemption under the following conditions:

- The transit refers exclusively to coal mined in Kazakhstan.
- The owner of the goods must not be a company from Russia or Belarus or a company subject to a sanctions regime.
- Transit through Russian ports must be direct, without additional processing or storage.
- All transactions must be carried out outside of financial institutions linked to the Russian system.

In 2022, Kazakhstan **exported** 4.4 million tonnes of coal to the EU, accounting for around 45% of its total exports. In 2023, this figure grew to 6.1 million tonnes. In 2024, there was a decline to 5.2 million tonnes due to logistical problems caused by the sanctions.

According to the Kazakh Ministry of Trade, 1.6 million tonnes of coal were exported to the EU in the first five months of 2025, which corresponds to 38.5% of total exports.

In terms of value, this amounts to around \$83 million. The most important target countries are Poland, Slovakia, the Czech Republic, and Hungary—countries that continue to rely heavily on thermal coal to **balance** their electricity grids.

Decision driven by internal energy needs

Brussels has not taken this decision out of political sympathy for Kazakhstan. On the contrary, the EU is under pressure from the internal needs of its member states to stabilise the energy sector at a national level, particularly in those countries that are most sensitive to supply disruptions.

Another important factor is the avoidance of political consequences: the absence of a derogation would force some EU members to look for alternative solutions bilaterally—beyond Brussels—which would

undermine the consistency of the sanctions policy.

Of all the post-Soviet states, Kazakhstan has made the greatest efforts to develop a technically neutral but de facto pro-Western energy policy

Thirdly, the EU recognises that pressure on Russia through a port ban is of limited value if it leads to disruptions in partner states not covered by the sanctions regime.

Of all the post-Soviet states, Kazakhstan has made the greatest efforts to develop a technically neutral but de facto pro-Western energy policy.

Its exclusion would have long-term consequences for the EU's relations with Central Asia.

Brussels adapts to market realities

This decision has three direct consequences:

1. Formalised flexibility of sanctions. For the first time, the EU has explicitly shown its willingness to adapt the technical aspects of sanctions to protect the functional interests of its members. This provides scope for future exemptions, not only in the coal sector but also in other areas—fertilisers, raw materials, and metals.

2. Giving Kazakhstan room for manoeuvre. Astana has thus received international confirmation that it is in a position to make certain political concessions, even at a time when European policy towards Russia is in a state of maximum rigidity. This strengthens its position with both Moscow and Beijing.

3. A precedent for other Central Asian countries. EU documents are already considering extending this exemption to other products from the region. For over 70% of

exports from Central Asia, logistics via Russia are unavoidable, and the current sanctions regime threatens to harm the EU's partners in the region.

In a political sense, this is not the "capitulation" of Brussels as portrayed by the Russian media, but a realistic assessment of the limits of a policy that attempts to function outside the laws of the market.

Sanctions do not have an automatic effect. If they are unable to distinguish between the target and the collateral damage, they become counterproductive.

In this case, the Union has shown that it has understood this—albeit quietly and without admitting it.

From an isolated case to a future framework

The question that remains is how many more exceptions will there be, and where does the line between targeted measures and systemic flexibility end?

If there are too many, the sanctions system will lose its symbolic and strategic value. If there are not enough of them, there is a political risk for the EU members themselves.



The EU has proven that strategic autonomy is important to it, but not at the cost of destabilising its own energy system

Therefore, the decision to exempt Kazakhstan from the EU's restrictive measures against Russian ports cannot be interpreted as an

isolated case.

It is an indicator not only of the structural weaknesses of the European energy and logistics strategy but also of its ability to make a functional correction at a crucial moment without jeopardising the overall political position.

Kazakhstan has acted rationally in this process, making optimal use of the room for manoeuvres given to it and showing that it knows how to negotiate with Brussels without creating dependencies.

For its part, the EU has proven that strategic autonomy is important to it, but not at the cost of destabilising its own energy system.

In the coming months, this model can also serve as a framework for negotiations with other countries—not because the EU wants to weaken the sanctions, but because reality dictates it.

This is a signal that the EU is prepared to pursue a sanctions policy based on the principle of manageable flexibility. This is not a capitulation but a redefinition of the instruments.

Kazakhstan has managed to assert its interests through a technically reasonable and politically neutral application without aggressive embassies and without an alliance with a major power. Brussels, confronted with the real needs of its members, accepted a compromise. This is both a lesson and a model for similar situations in the future.