

## **SANCTIONS POLICY AS A NECESSARY COMPONENT OF NATIONAL SECURITY AND POST-WAR RECOVERY OF UKRAINE: DEFICIENCIES AND WAYS TO OVERCOME THEM**

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### **INTRODUCTION**

The word «sanction» originates from the Latin «sanctio» – an inviolable decree; the strictest prescription. In the modern world, this term has various meanings depending on the context. In general, it refers to certain measures directed at a violator, resulting in negative consequences. In international relations, sanctions serve as an instrument of influence on a state that has violated international obligations or norms of international law<sup>1</sup>.

One of the earliest recorded instances of sanctions dates back to the fifth century BC. With the Megarian Decree in 432 BC, the Athenians imposed economic sanctions by restricting Megarian citizens from accessing the markets of the Athenian Empire<sup>2</sup>. Since then, such restrictions have been a tool for achieving various foreign policy objectives. In the 6th–12th centuries, the concept of «reprisals» emerged, denoting the right to apply coercive measures to recover a pledge ensuring the fulfillment of obligations between parties. The prominent medieval Roman law jurist Bartolus de Saxoferrato dedicated a treatise, *Tractatus Repressalium* (1354), to this phenomenon, arguing that a state has the right to violate the rights of another state in response to similar violations to compel it to adhere to legal norms and restore justice<sup>3</sup>. After World War I, sanctions were enshrined in the Covenant of the League of Nations, and since 1945, they have become an official instrument of the United Nations. In the 20th century, the United States was the most active user of sanctions, particularly against Iran following the 1979 Islamic Revolution. By the late 20th century, the UN had begun applying restrictions against countries that violated international law (e.g., Iraq, Haiti, Yugoslavia).

A new phase of sanctions policy began in 2014 following Russia's aggression against Ukraine. The international community then introduced large-scale restrictions against Russia, making them a key element of the global containment strategy and a response to violations of international law. The global sanctions mechanism underwent even greater transformations after Russia's full-scale invasion of Ukraine in 2022. Since then, Russia has become

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<sup>1</sup> Словник української мови: в 11 томах / за заг. ред. І. К. Білодіда. Том 9. Київ: Наукова думка, 1978. С. 54

<sup>2</sup> Croix G. *The Origins of the Peloponnesian War* / G. Croix. – Ithaca; NY : Cornell University Press, 1972. p. 225-290

<sup>3</sup> Giltaij J. Roman law and the causa legitima for reprisal in Bartolus. *Fundamina* (Pretoria). 2014. Vol. 20, № 1. P. 53

the most sanctioned country in the world, and sanctions have become one of the main tools to weaken its economy and halt aggression.

The increased activation of sanctions processes in partner countries was accompanied by several changes in their sanctions policies to enhance the effectiveness of such measures while simultaneously reducing their negative impact on their own economies, thereby adhering to the concept of smart sanctions<sup>4</sup>.

Ukraine, in conditions of aggression, has a primary interest in strengthening national security, particularly through the implementation of an effective sanctions policy. This serves not only as a protective instrument but also as an example for partner countries, encouraging them to adopt similar measures. However, despite the introduction of unique sanctions measures aimed at depriving aggressor accomplices of economic influence, particularly the use of asset seizure sanctions<sup>5</sup>, Ukraine's sanctions mechanism still contains a number of deficiencies that significantly reduce its effectiveness and pose risks of violating the rights of sanctioned individuals and those indirectly affected by sanctions.

### **1. Key Deficiencies of the Current Sanctions Mechanism and Ways to Overcome Them**

Sanctions have become a key mechanism of pressure on Russia to end the war. Since the beginning of the full-scale invasion, Ukraine has significantly strengthened its own sanctions policy, becoming an influential player within the coalition of sanctioning countries. Cooperation with partners has ensured effective sanctions against the aggressor and its accomplices, including price caps on Russian oil and control over the supply of critical components. Sanctions pressure remains an important tool for deterring aggression, and Ukraine continues to work on expanding its scope.

At the same time, the more extensive sanctions are applied, the more deficiencies in the system become apparent. This issue became particularly relevant following the adoption of a package of personal sanctions that included a former president and a representative of the opposition party<sup>6</sup>.

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<sup>4</sup> Bernatskyi B. Un(packing) Sanctions Data: What Can Sanctions Numbers Teach Us. *European Papers*. Vol. 9. 2024. № 3, pp. 86-87

<sup>5</sup> Климосюк А. Механізм реалізації державної політики у сфері стягнення в дохід держави активів осіб, щодо яких застосовано санкції. *Наукові інновації та передові технології*. № 2(30) (2024). с.145-154. DOI: [https://doi.org/10.52058/2786-5274-2024-2\(30\)-145-154](https://doi.org/10.52058/2786-5274-2024-2(30)-145-154)

<sup>6</sup> Указ Президента України №81/2025 “Про рішення Ради національної безпеки і оборони України від 12 лютого 2025 року «Про застосування персональних спеціальних економічних та інших обмежувальних заходів (санкцій)»”. URL: <https://www.president.gov.ua/documents/812025-53777>

This decision sparked a strong public reaction, with several human rights organizations<sup>7</sup> and the legal community<sup>8</sup> criticizing it for the possible use of sanctions for political purposes and as a substitute for law enforcement and judicial processes.

In this regard, it is necessary to analyze the main deficiencies of the current Ukrainian sanctions mechanism and outline ways to address them.

## **2. Sanctions against Ukrainian citizens**

According to the Law of Ukraine «On Sanctions»<sup>9</sup> restrictive measures can be applied to foreign states, foreign legal entities, companies controlled by foreign subjects, foreigners, stateless persons, and entities engaged in terrorist activities.

Thus, the law does not explicitly provide for the imposition of sanctions on Ukrainian citizens. However, they may fall under the category of persons involved in terrorist activities. The practice of imposing sanctions on Ukrainian citizens is based on a broad interpretation of the term «terrorist activity.» The relevant legislation<sup>10</sup> does not provide a precise definition, but it outlines two main categories:

Activities aimed at committing terrorist acts (including the dissemination of terrorist ideology, financing, or other support for terrorism);

Propaganda of the Russian regime and support for Russia's armed aggression against Ukraine.

During the adoption of the Law «On Sanctions» in 2014, the Main Legal Department of the Verkhovna Rada of Ukraine pointed out the deficiencies of this approach. They argued that sanctions should only apply to individuals whose involvement in terrorist activities has been established by a court. However, the current sanctions mechanism does not require the presence of a criminal conviction. This approach has been criticized by scholars<sup>11</sup>, who

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<sup>7</sup> Правозахисні організації виступили щодо застосування персональних санкцій проти Порошенка, Жеваго, Коломойського та Боголюбова. Українська Гельсінська спілка з прав людини. URL: <https://www.helsinki.org.ua/articles/pravozakhysni-orhanizatsii-vystupyly-shchodo-zastosuvannia-personalnykh-sanktsiy-proty-poroshenka-zhevahko-kolomoyskoho-ta-boholiubova/>

<sup>8</sup> Заява Асоціації правників України щодо застосування санкцій до громадян України. URL: [https://uba.ua/ukr/news/zvernennja-apu-shchodo-zastosuvannja-sankcij-do-gromadjan-ukraini?fbclid=IwY2xjawIPIVhleHRuA2FlbQlXMAABHT4-ZoDbUS1g\\_Dn8sxnFscbLINZza0GhianJkHYSNNNDgm5fSleiYjzFjqg\\_aem\\_6u-4hqRPXGR7yoI39OWPYg](https://uba.ua/ukr/news/zvernennja-apu-shchodo-zastosuvannja-sankcij-do-gromadjan-ukraini?fbclid=IwY2xjawIPIVhleHRuA2FlbQlXMAABHT4-ZoDbUS1g_Dn8sxnFscbLINZza0GhianJkHYSNNNDgm5fSleiYjzFjqg_aem_6u-4hqRPXGR7yoI39OWPYg)

<sup>9</sup> Про санкції. Закон України від 14 серпня 2014 року № 1644-VII / Верховна Рада України. URL: <https://zakon.rada.gov.ua/laws/show/1644-18#Text>

<sup>10</sup> Про боротьбу з тероризмом. Закон України від 20 березня 2003 року № 638-IV / Верховна Рада України. URL: <https://zakon.rada.gov.ua/laws/show/638-15#Text>

<sup>11</sup> Хоббі Ю. Проблеми нормативно-правового регулювання санкцій в Україні в контексті міжнародного досвіду. Правовий часопис Донбасу. 2021. № 4. С. 51–59. DOI: <https://doi.org/10.32366/2523-4269-2021-77-4-51-59>

emphasize the need to clearly define and establish cases where sanctions can be applied to Ukrainian citizens.

Given that the grounds for imposing sanctions and the evidence provided by initiators remain classified and are not publicly disclosed, the practical interpretation and substantive content of the term «terrorist activity» can only be analyzed based on the decisions of the High Anti-Corruption Court (HACC) in cases involving asset seizure sanctions.

In the case of Yanukovych<sup>12</sup>, the application of sanctions against the former president was justified by his engagement in terrorist activities. This conclusion was based on the Law of Ukraine «On the Prohibition of Propaganda of the Russian Nazi Totalitarian Regime, Armed Aggression of the Russian Federation as a Terrorist State Against Ukraine, and Symbols of the Military Invasion of the Russian Nazi Totalitarian Regime into Ukraine»<sup>13</sup>. This law recognized the Russian Federation as a terrorist state and expanded the definition of terrorist activities to include «propaganda of the Russian Nazi totalitarian regime, armed aggression of the Russian Federation as a terrorist state against Ukraine.» Accordingly, the HACC concluded that Yanukovych supported the state policy of the Russian Federation and promoted the ideas of the terrorist state regarding aggression against Ukraine.

In the case of pro-Russian TV host Kot, the court, after a comprehensive assessment of his actions, concluded that he consistently and unwaveringly expressed public support for armed aggression, persistently promoted the Russian regime, and endorsed the ideology of terrorism. The court stated:

*«The court also established that the defendant's actions incited armed aggression against Ukraine, genocide of the Ukrainian people; justified acts that, under international law and/or Ukrainian legislation, have the characteristics of war crimes; legitimized the occupation of Ukrainian territories; incited hatred towards the Ukrainian people, its culture, state language, and national identity... The established actions of the defendant correspond to the definition of 'terrorist activity' enshrined in the relevant law. The active pro-Russian stance of a Ukrainian citizen exhibits characteristics inherent in terrorist activities; thus, in this case, the grounds for imposing sanctions under the sanctions legislation are identical to those encompassed by the concept of terrorist activity. This, in turn, necessitates recognizing the defendant's actions as terrorist activities and, accordingly, imposing*

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<sup>12</sup> Рішення Вищого антикорупційного суду від 12 грудня 2022 року по справі № 991/5572/22. URL: [https://court.gov.ua/userfiles/media/new\\_folder\\_for\\_uploads/hcac/administrative/judgments/991\\_5572\\_22\\_12-12-2022.pdf](https://court.gov.ua/userfiles/media/new_folder_for_uploads/hcac/administrative/judgments/991_5572_22_12-12-2022.pdf)

<sup>13</sup> Про заборону пропаганди російського нацистського тоталітарного режиму, збройної агресії Російської Федерації як держави-терориста проти України, символіки воєнного вторгнення російського нацистського тоталітарного режиму в Україну. Закон України від 22 травня 2022 року № 2265-IX / Верховна Рада України. URL: <https://zakon.rada.gov.ua/laws/show/2265-20#Text>

*sanctions in the form of asset confiscation to the state revenue, regardless of his formal Ukrainian citizenship»<sup>14</sup>.*

Regarding the application of sanctions to individuals who hold dual citizenship, including Ukrainian and another nationality, the legal practice is well-established. The presence of foreign citizenship, predominantly Russian, provides grounds to consider such an individual a non-resident. For example, a legal assessment of this situation was provided by the HACC in the case of Bohuslayev<sup>15</sup>.

From a legal standpoint, countries within the sanctions coalition generally do not prohibit the application of sanctions against their own citizens. For instance, U.S. sanctions policy typically restricts activities within U.S. jurisdiction as well as those involving U.S. persons, which include U.S. citizens, foreign permanent residents, legal entities incorporated under U.S. law or any U.S. jurisdiction (including foreign branches), and any person present in the United States.

At the same time, the sanctions policies of partner countries are characterized by greater transparency, predictability, and well-defined procedures, including the right to appeal. This significantly reduces the risk of politicization in the decision-making process for imposing sanctions.

Given the above considerations, especially in the context of ongoing aggression and the challenges of post-war recovery, we believe that Ukraine should not abandon the approach that allows for the imposition of sanctions on its own citizens. However, sanctions cannot replace other legal mechanisms of state enforcement and coercion. They serve as an exceptional tool that enables rapid response to national security threats, particularly in cases where traditional legal measures are ineffective, such as when the subject is beyond the state's reach. If a person resides in Ukraine, does not evade law enforcement authorities, and their actions exhibit signs of a criminal offense, the state should use criminal proceedings rather than the sanctions mechanism.

Therefore, the issue of imposing sanctions on Ukrainian citizens should be clearly and unambiguously regulated, with amendments to the Law of Ukraine «On Sanctions» specifying that sanctions against Ukrainian citizens should only be applied if they are residing abroad or in temporarily occupied territories not under the control of the Ukrainian government.

### **3. Revision, appeal and cancellation of sanctions**

One of the key issues of Ukraine's sanctions policy is the difficulty of lifting imposed sanctions. Although an effective mechanism for protection

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<sup>14</sup> Рішення Вищого антикорупційного суду від 25 грудня 2024 року по справі № 991/13382/24. URL: <https://reyestr.court.gov.ua/Review/124048002>

<sup>15</sup> Рішення Вищого антикорупційного суду від 2 грудня 2024 року по справі № 991/9618/24. URL: <https://reyestr.court.gov.ua/Review/123749144>

against unjustified sanctions should include the possibility of their prompt appeal, in practice, this process faces significant limitations for several reasons.

Firstly, there is no mechanism for initiating the cancellation of sanctions. According to the Law «On Sanctions», restrictive measures can only be lifted if their objective has been achieved and exclusively at the proposal of the initiators of the sanctions, including the Verkhovna Rada, the President, the Cabinet of Ministers, the National Bank, or the Security Service of Ukraine. This effectively deprives sanctioned individuals of the ability to directly appeal to the National Security and Defense Council for a review of the decision, which significantly limits their right to protection and creates risks of abuse. For example, if a person is included in the sanctions list due to a technical error or misidentification, lifting such sanctions can become an extremely difficult task.

Secondly, the process of sanctioning is non-transparent. The imposition of sanctions in Ukraine often relies on classified materials, making access to relevant information restricted. This not only complicates the ability to appeal a presidential decree in court but also limits the understanding of the grounds for their application. The absence of clear criteria for when sanctions may be lifted results in situations where they remain in force indefinitely, even when their relevance has long expired.

Thirdly, there is no clear procedure for reviewing sanctions. According to the law, decisions on sanctions must specify their duration<sup>16</sup>. An analysis of presidential decrees imposing sanctions shows that most personal sanctions are applied for five or ten years. However, legislation does not establish mandatory periodic reviews of sanctions. As a result, sanctions can remain in effect even when the reasons for their imposition have long ceased to exist.

Fourthly, judicial protection is limited. Although, in theory, an individual may challenge sanctions in court, in practice, this is not always effective, particularly given the recent legal position of the Supreme Court's Grand Chamber. The approach formed by the Grand Chamber indicates that the court's authority to assess the grounds for applying sanctions is limited:

*«The scope and outcome of the President of Ukraine's assessment of the significance of the risks that led to the imposition of restrictive measures against the plaintiff are beyond judicial review, as the administrative court is not empowered to decide on national security and defense matters or to coordinate and oversee the activities of executive authorities in the field of national security and defense»<sup>17</sup>.*

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<sup>16</sup> Про санкції. Закон України від 14 серпня 2014 року № 1644-VII / Верховна Рада України. URL: <https://zakon.rada.gov.ua/laws/show/1644-18#Text>

<sup>17</sup> Постанова Великої Палати Верховного Суду від 27 серпня 2024 року по справі № 800/162/16. URL: <https://reyestr.court.gov.ua/Review/122434173>

It is considered that such an approach by the Grand Chamber in this case does not align with the position established by European judicial institutions and the practice of the European Court of Human Rights (ECHR).

For example, the Court of Justice of the European Union has stated that even if sanctions are imposed by the European Union in compliance with UN Security Council resolutions, courts have the right to review their justification from the perspective of fundamental human rights compliance<sup>18</sup>.

A similar position has been articulated by the ECHR, specifically that an individual subject to sanctions must have the right to challenge the validity of such measures. Moreover, courts hearing such cases must have «full jurisdiction», meaning the ability to conduct a substantive review and assess whether the grounds for imposing sanctions were sufficient<sup>19</sup>.

Thus, the practice of European judicial institutions demonstrates the necessity of effective judicial oversight of sanctioning decisions to ensure the protection of individual rights and the possibility of appealing them based on a full and objective judicial review.

The deficiencies identified in Ukraine's sanctions mechanism indicate the need for significant reforms to ensure transparency, effective judicial oversight, and the protection of human rights. It is necessary to introduce an administrative procedure for lifting sanctions at the initiative of affected individuals, as well as to establish a process for the regular review of sanctions decisions. Additionally, judicial powers should be expanded to allow for a substantive review of the justification for sanctions, ensuring the possibility of appealing them in accordance with European standards of justice.

#### **4. Lack of a unified body responsible for implementing the sanctions policy**

The law regulates the procedure for imposing sanctions. Specifically, sanctions can be initiated by the Verkhovna Rada of Ukraine, the President of Ukraine, the Cabinet of Ministers of Ukraine, the National Bank of Ukraine, and the Security Service of Ukraine. The sanction of asset seizure is initiated separately through a lawsuit filed by the Ministry of Justice to the High Anti-Corruption Court<sup>20</sup>.

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<sup>18</sup> Court of Justice of the European Union (CJEU), Abdullah Kadi and Al Barakat International Foundation v. Council and Commission, Joined Cases C-402/05 P and C-415/05 P, Judgment of 3 September 2008. URL: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62005CJ0402>

<sup>19</sup> European Court of Human Rights (ECtHR), Al-Dulimi and Montana Management Inc. v. Switzerland, Application no. 5809/08, Grand Chamber Judgment of 21 June 2016. URL: <https://hudoc.echr.coe.int/eng/?i=001-164515>

<sup>20</sup> Климосюк А. Механізм реалізації державної політики у сфері стягнення в дохід держави активів осіб, щодо яких застосовано санкції. Наукові інновації та передові технології. № 2(30) (2024). с.145-154. DOI: [https://doi.org/10.52058/2786-5274-2024-2\(30\)-145-154](https://doi.org/10.52058/2786-5274-2024-2(30)-145-154)

However, the process of implementing imposed sanctions is not adequately regulated, and its regulation in the law is fragmented. Certain powers are assigned to the Ministry of Justice as the central executive body responsible for enforcing state policy on the confiscation of assets belonging to sanctioned persons.

Given the broad range of sanctions outlined in the law, numerous entities are involved in enforcing the state's sanctions policy. Previous research has shown that over 15 government agencies and a wide range of other entities, such as banks, non-banking institutions, depository institutions, investment firms, and asset management companies, are responsible for implementing sanctions. For example, the sanction «restriction, partial or complete suspension of transit of resources, flights, and transportation through Ukraine» is enforced by the State Service of Maritime and Inland Water Transport, the Ministry of Infrastructure, and the State Aviation Service. Similarly, sanctions involving «revocation or suspension of licenses and other permits» are enforced by the State Regulatory Service, the State Service of Geology and Mineral Resources, and the State Tax Service<sup>21</sup>.

This deficiency in sanctions policy is not unique. The implementation of EU sanctions is delegated to more than 160 competent authorities across EU member states, with the number of such entities ranging from one to twenty-seven per country. For instance, Latvia officially had 27 entities responsible for implementing sanctions, while Malta adopted the opposite approach by establishing a single competent authority – the Sanctions Monitoring Board (under the Ministry of Foreign Affairs)<sup>22</sup>.

A decentralized approach to sanctions implementation has been recognized as one of the key weaknesses of the European Union's sanctions policy, which member states have been working to address. Latvia has already addressed this issue, and as of April 1, 2024, the Financial Intelligence Unit has been assigned the authority to oversee the enforcement of international and national sanctions<sup>23</sup>.

Considering best global practices, Ukraine should also centralize the process of implementing sanctions. Additionally, the absence of a clearly defined authority responsible for sanctions policy has been identified as a

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<sup>21</sup> Климосюк А. Суб'єкти реалізації державної політики України. Публічне адміністрування та національна безпека. 2023. № 11. С. 60-65. DOI: <https://doi.org/10.25313/2617-572X-2023-11-9519>

<sup>22</sup> Климосюк А. Децентралізований підхід у імплементації санкцій як фактор, що зменшує ефективність санкційної політики ЄС. Актуальні питання у сучасній науці. 2024. № 1(19). С. 164-172. URL: <http://perspectives.pp.ua/index.php/sn/article/view/8517/8563>

<sup>23</sup> Климосюк А. С. Видача дозволів на дії, заборонені санкціями: європейський досвід та перспективи для України. Електронне наукове видання «Публічне адміністрування та національна безпека». 2024. №8. <https://doi.org/10.25313/2617-572X-2024-8-10237>



systemic deficiency in the Report on the Initial Assessment of the Implementation of EU Law (acquis EU)<sup>24</sup>.

It is worth noting that the idea of establishing such a centralized authority was previously proposed in a legislative initiative – draft law № 5191 «On the Fundamentals of Ukraine’s Sanctions Policy». This draft law aimed to create a coordinating body for entities involved in implementing Ukraine’s sanctions policy – the Bureau for Sanctions Policy under the National Security and Defense Council of Ukraine. This body was intended to include representatives from various state agencies responsible for implementing sanctions. Its proposed powers included continuous monitoring and assessment of the economic, political, and legal consequences of imposing, modifying, or lifting sanctions; developing and publishing clarifications, guidelines, recommendations, and other informational materials on Ukraine’s sanctions policy; monitoring compliance with sanctions legislation; and providing individual clarifications in response to requests from individuals or legal entities regarding proper compliance with sanctions requirements<sup>25</sup>.

Current practices in implementing sanctions policy demonstrate an urgent need for such functions, particularly by a single specialized body whose primary role would be administering sanctions. However, despite being proposed four years ago, this bill has yet to be considered in the first reading, and its highly relevant ideas have not been implemented.

Given the deficiencies described above, establishing such an authority could significantly enhance the effectiveness of Ukraine’s sanctions policy. Moreover, this would align with best global practices and EU requirements. Therefore, it is necessary to revisit this idea and develop appropriate amendments to sanctions legislation.

## CONCLUSIONS

Sanctions have become one of the key mechanisms for deterring aggression and protecting Ukraine’s national security. However, an analysis of the current sanctions mechanism reveals significant deficiencies that undermine its effectiveness and may lead to human rights violations. The main issues include the lack of an administrative procedure for independently appealing sanctions, the non-transparent nature of their application procedures, and limited judicial oversight over the justification of sanctions decisions.

A particularly pressing issue is the imposition of sanctions on Ukrainian citizens. Current legislation does not provide a clear regulatory framework for this matter, creating risks of abuse and the use of the sanctions mechanism as

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<sup>24</sup> Звіт за результатами проведення первинної оцінки стану імплементації актів права Європейського Союзу (acquis ЄС). URL: <https://eu-ua.kmu.gov.ua/wp-content/uploads/Zvit-UA.pdf>

<sup>25</sup> Про засади санкційної політики України. Проект Закону № 5191 від 02.03.2021/ Верховна Рада України. URL: <https://itd.rada.gov.ua/billinfo/Bills/Card/25779>

a substitute for criminal prosecution. Establishing clearer legal criteria and restricting the application of sanctions to citizens who reside in Ukraine and are not evading law enforcement could enhance the legitimacy of this instrument.

Another major issue is the absence of a single authority responsible for implementing sanctions policy. At present, Ukraine's sanctions process is fragmented, complicating its effective enforcement and oversight. The experience of other countries, particularly EU member states, demonstrates that centralizing sanctions administration significantly improves efficiency. Ukraine should revisit the idea of establishing a specialized body responsible for coordinating sanctions policy, monitoring its implementation, and ensuring the effective enforcement of restrictive measures.

Thus, improving the sanctions mechanism will enhance its effectiveness, align it with European standards, and safeguard human rights – an essential step in the context of the ongoing war and Ukraine's future reconstruction.

## **SUMMARY**

The article examines Ukraine's current sanctions mechanism, its effectiveness, and key deficiencies. The authors highlight major issues such as the lack of transparency in the sanctioning process, limited judicial oversight, and the inability to independently challenge sanction decisions. Special attention is given to the application of sanctions against Ukrainian citizens, which poses risks of abuse and politicization. Additionally, the absence of a single state authority responsible for implementing sanctions policy is identified as a challenge that complicates coordination and monitoring efforts. The conclusion proposes several reforms, including the creation of a centralized sanctions administration body, the introduction of transparent mechanisms for sanction reviews, and the expansion of judicial oversight to align with European standards.

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