United States Senate

WASHINGTON, DC 20510

September 19, 2025

The Honorable Marco Rubio Secretary of State U.S. Department of State 2201 C Street N.W. Washington, D.C. 20451

The Honorable Scott Bessent Secretary of the Treasury Department of the Treasury 1500 Pennsylvania Avenue N.W. Washington, D.C. 20220

Dear Secretary Rubio and Secretary Bessent:

The Trump Administration is implementing what is now a seven-month pause on issuing basic, targeted Russia sanctions designations, despite President Trump's stated desire to increase economic pressure against President Putin. Now, China is openly flouting U.S. sanctions and has become the first country to take deliveries from Russia's flagship Arctic LNG 2 project, strengthening the lifeline that China provides to Putin's war machine. We call on the Trump Administration to resume the regular cadence of targeted Russia sanctions as evaders increasingly degrade the President's leverage to help negotiate a just peace.

The failure to enforce even existing sanctions against Russia and apparent willingness to give China a free pass to buy Russian energy fundamentally undercuts efforts to bring about an end to the war and to impact the Kremlin's calculus in negotiations. The case of Arctic LNG 2 is just one stark example. Until recently, the United States and our partners had used targeted sanctions to successfully prevent any buyers for Arctic LNG 2, one of the Kremlin's most strategically important potential revenue streams. Russia hoped the project would help it capture a larger share of the global LNG market and bring in billions of dollars in revenue, but our sanctions measures disrupted its global financing, insurance, and shipping services, forcing Arctic LNG 2 to halt operations last October.\(^1\)

The project struggled to find anyone willing to defy U.S. sanctions and risk being designated themselves—the kind of designation that the United States had regularly employed, until January 2025, hundreds of times against sanctions evaders around the world in order to maintain pressure on Russia. But since the Putin-Xi summit a few weeks ago, for the first time, at least four cargoes from the project have been offloaded at a Chinese terminal, with market analysts and headlines warning, "China Is Cranking Up Its LNG Trade With Russia in Test For Trump" and

¹ Bloomberg, "Russia's Arctic LNG 2 Plant Halts Amid Tightening US Sanctions," October 24, 2024, https://www.bloomberg.com/news/articles/2024-10-25/russia-s-arctic-lng-2-plant-halts-amid-tightening-us-sanctions.

"China Starts Buying U.S.-Sanctioned Russian Gas, Defying Trump." Energy analysts have warned that absent a swift and decisive response, these first deliveries will signal to other potential buyers that they can buy sanctioned Russian LNG cargo without consequence, opening up the floodgates for Russia to receive tens of billions of dollars in revenue to fund its war machine and continue to kill Ukrainian civilians.

This is not the only way that the PRC is helping Russia sustain this war. The PRC continues to provide Russia with dual-use exports and key components needed to strengthen Russia's defense industrial base and ensure it can continue to produce the munitions and platforms being used to devastating effect in Ukraine.

Abandoning efforts to reinforce targeted sanctions that have proved so effective would enable the sale of this Russian energy and the reconstitution of Russia's defense industry, restoring the Kremlin's confidence about its revenue streams and military capabilities, and strengthening Putin's belief that Russia can wait out U.S. pressure while continuing brutal attacks on Ukrainian cities.

While President Trump has refused to use his own broad authority to ratchet up or even maintain pressure on Russia and its global enablers, our European partners have stepped up and led the charge. This year, The European Union and the United Kingdom have implemented multiple rounds of targeted sanctions—and have lowered the price cap on Russian oil—while the United States has abandoned its leadership role. President Trump asserts he won't act until others stop buying Russian oil, but the G7 implemented a Russian oil embargo in 2022, and the European Union is also phasing out imports of petroleum products originally made from Russian crude. As a first step, President Trump could press the leaders of Hungary and Slovakia, two European countries that have insisted on continuing to import oil from Russian pipelines, to close their exception to Europe's oil embargo.

Targeted sanctions are the backbone of our pressure to end the war and help Ukraine achieve a just peace. The Administration's claims that even basic Russia sanctions would scuttle negotiations do not stand up to scrutiny. For example, the Administration has implemented more than 20 sanctions rollouts on Iran while maintaining talks or the prospect of negotiations. In the meantime, Russia is growing stronger, China is growing richer, and Ukraine and our allies are suffering as a result of the Administration's inaction. It is critical for the Administration to change course in order to end this war and achieve a lasting peace.

We request answers to the following questions no later than October 1, 2025:

1. Is the Administration preparing sanctions packages targeting individuals or entities associated with these cargoes to reinforce the U.S. sanctions on Arctic LNG 2, as China

² Bloomberg, "China is Cranking Up Its LNG Trade With Russia in Test For Trump," Stephen Stapczynski, September 7, 2025, https://www.bloomberg.com/news/articles/2025-09-08/china-is-cranking-up-its-lng-trade-with-russia-in-test-for-trump; Newsweek, "China Starts Buying US-Sanctioned Russian Gas, Defying Trump," September 10, 2025, https://www.newsweek.com/china-buys-us-sanctioned-russia-gas-2127140.

³ Reuters, "China receives first Arctic LNG 2 cargo ahead of Putin's visit, data shows," Emily Chow, August 29, 2025, https://www.reuters.com/business/energy/china-receives-first-arctic-lng-2-cargo-ahead-putins-visit-data-shows-2025-08-29/.

continues to offload the first ever cargoes from this designated, strategically important project?

- 2. How does the Administration now intend to deter other major energy importers from following China's precedent?
- 3. What is the Administration's plan to restore economic pressure against Russia, including by resuming regular, systematic sanctions rollouts to maintain sustained pressure on Russia's revenue and its critical defense-related imports as cases of evasion proliferate?
- 4. Did Secretary Bessent raise Arctic LNG 2 with PRC Vice Premier He Lifeng during his mid-September meetings in Madrid?
- 5. In those meetings, did Secretary Bessent raise any of the numerous publicly reported cases of PRC dual-use exports to Russia and PRC-Russia payment mechanisms that are helping Russia continue its war of aggression?

The United States must not permit Russia to quietly reintegrate into global markets through deliberate sanctions evasion, and the stakes are higher when the evasion is as blatant and brazen as this. Ukraine's future and the integrity of U.S. sanctions are directly at stake.

Sincerely,

Elizabeth Warren

Ranking Member

Committee on Banking,

Housing, and Urban Affairs

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