



ANALYSIS

THE CASE FOR A VISA BAN PATHWAYS TO DENYING RUSSIAN (EX-)COMBATANTS ENTRY TO THE EU

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Cover page photo: A policeman stands next to 'dragon's teeth' fortifications, pyramidal anti-tank obstacles, at the Estonian-Russian border in the Narva crossing on 15 December 2024. Marko Mumm / AFP / Scanpix

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LIST OF ABBREVIATIONS

EEAS	European External Action Service
FSB	Federal Security Service (<i>Федеральная служба безопасности</i> , Russia)
MVD	Ministry of Internal Affairs (<i>Министерство внутренних дел</i> , Russia)
PET	Danish Security and Intelligence Service (<i>Politiets Efterretningstjeneste</i>)
POW	Prisoner of War
QMV	Qualified Majority Voting
SIS	Schengen Information System
VIS	Visa Information System
VLA	Foreign Intelligence Service (<i>Välisluureamet</i>)

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European space to them is in everyone's security interest. "There can be no path from Bucha to Brussels," Estonian Foreign Minister Margus Tsahkna said when advocating a "well-coordinated" common policy at the EU level.⁴

Two distinct yet overlapping threat arguments apply here: hybrid operations and criminality

Two distinct yet overlapping threat arguments apply here: (1) covert, hybrid and intelligence operations and (2) criminality. Russia has been actively recruiting its prison population into the armed forces: an estimated 180 000 inmates to date.⁵ Crime levels, including violent crime, in Russia itself have been rising, with many atrocious acts committed by the demobilised, and former convicts among them.⁶ Estonian government officials compared these Russian combat veterans, in a post-war scenario, to the infiltration into Europe by former Islamist fighters, those who took part in the Balkan wars, or returned from Afghanistan and Chechnya, with all the security implications, when urging Europe not to repeat the past mistakes.⁷

The Danish Security and Intelligence Service (*Politiets Efterretningstjeneste*, PET) warned that Russian special services are actively

INTRODUCTION

*"Strong external borders and resilience are our wall of Europe's freedom."*¹

Up to 1.5 mn Russians have participated in Russia's war of aggression since February 2022, of whom around 640 000 are still at the front in Ukraine.² The daily recruitment rate to the Russian Armed Forces is between 800 and 1 000, with slightly below 80 000 people having signed contracts to kill – at times, for no reason other than high pay – in the first quarter of 2026.³ Depending on how much longer the war drags on, thousands more Russians will join the ranks, rotate, and, at some point, demobilise. Closing the common

¹ Siseministerium [Estonian Ministry of the Interior], "Nordic and Baltic Interior Ministers in Tallinn: A Strong External Border and Our Resilience Are the Wall of Europe's Freedom," 19 June 2025.

Vabariigi Valitsus [Estonian Government], "Eesti: turvalisuse nimel tuleb Vene agressoritele Euroopa kõik ukseid sulgeda [Estonia: For security, all European doors must be closed to Russian aggressors]," 15 January 2026. These figures count participants and should not be confused with casualty estimates, which count aggregate killed, wounded, and missing, and are not a subset of the participation figure. See, for example: Seth G. Jones and Riley McCabe, "Russian Blood and Treasure: The Ballooning Costs of Putin's War," Center for Strategic and International Studies, 1 July 2026.

³ Janis Kluge, "Russian recruitment fell by 20% in Q1/2026," *Russianomics* (Substack), 12 April 2026; Janis Kluge, "Russian recruitment stabilizes at 1,000 per day," *Russianomics* (Substack), 8 August 2026.

⁴ Jorge Liboreiro, "EU considers entry ban on Russian soldiers who fought in Ukraine," *Euronews*, 29 January 2026.

⁵ Gavin Blackburn, "Russia's prison population falls by 40%, partly by sending convicts to fight in Ukraine," *Euronews*, 14 May 2026; Rikard Jozwiak, "Wider Europe Briefing: Stopping Former Russian Soldiers From Entering the EU," *Radio Free Europe/Radio Liberty*, 3 February 2026.

⁶ Välisluureamet [Estonian Foreign Intelligence Service], *International Security and Estonia 2026* (Estonian Foreign Intelligence Service, 2026); Daria Talanova, Sonya Richter, and Ksenia Storozheva, "Coming Home to Roost. How Veterans of the War in Ukraine Are Reshaping Russia's Crime Statistics," *Novaya Gazeta Europe*, 3 February 2026.

⁷ Välisministeerium [Estonian Ministry of Foreign Affairs], "Foreign Minister Tsahkna to EU Foreign Ministers: There Must Be No Path from Bucha to Brussels," 29 January 2026; Valitsus, "Eesti: turvalisuse nimel"; Siseministeerium [Estonian Ministry of the Interior], "Siseminister Taro: lisasime sissesõidukeeldude nimekirja tuhatkond uut Vene kombataniti [Interior Minister Taro: We Added a Thousand New Russian Combatants to the Entry Ban List]," 6 February 2026; "Estonia Bans over 1,000 More Russian Soldiers from Entering Schengen Zone," *ERR*, 6 February 2026; Daria Shulzhenko, "A Wave of Lawlessness – Returning from War in Ukraine, Russian Convicts Commit Crimes at Home," *The Kyiv Independent*, 17 September 2024.

preparing acts of sabotage targeting the local defence industry – the most recent public announcement in a series of assessments shared by Nordic-Baltic colleagues.⁸ The Estonian Foreign Intelligence Service (*Välisluureamet*, VLA) clearly states that Russian frontline soldiers pose a threat to the neighbouring states and prescribes a course of action to mitigate it:⁹

“In light of these risks, it is important to maintain additional travel restrictions and enhanced background checks for visa applications originating from Russia, even after the end of the full-scale war. This will also help prevent Russian war criminals from entering Europe.”

Meanwhile, the EU issued over 623 000 short-stay Schengen visas to Russian nationals in 2025, up 8% on 2024.¹⁰ Of 679 000 applications submitted, France, Italy, and Spain processed most, nearly three-quarters of that total, with France both issuing the largest number and recording the sharpest increase.¹¹ Among such recipients was a suspect in an attempted attack at Leipzig airport in August 2026: a Belarusian citizen with a Russian passport, believed to have entered Germany on an Italian-issued tourist visa.¹² Although publicly accessible information suggests that this man did not serve on the front line in Ukraine, hundreds of thousands of his compatriots have. They have gained war-fighting skills as well as potential connections to organised

crime, but have also been traumatised, brainwashed, and radicalised into believing they fought and lost their comrades in Russia’s ‘existential war against the west’. Many return home with a history of alcoholism, drug abuse, weapons trafficking, physical and sexual violence, abuse of power, theft and looting, and, more importantly, a sense of lawlessness and impunity for it all, while the Kremlin lacks effective mechanisms to reintegrate military veterans into society and civilian life.¹³ The civilian economy in the Russian heartland is unlikely to ever offer them the same generous wages they became accustomed to on the battlefield. The Russian security services, however, might (whether they will pay the bill is a separate matter). Combat-experienced – in dealing with explosives, for instance – returnees are an ideal recruitment pool for sabotage and subversion.

Several pathways to bar them from entering the EU are open today: (1) individual countries’ designations via the Schengen Information System (SIS); (2) a basis for a visa

Combat-experienced returnees are an ideal recruitment pool for sabotage and subversion

ban within the 21st sanctions package; and (3) a new standing category in the revised EU Visa Code. Through different instruments and procedures, they all serve the same goals: denying Russian intelligence and security services and their agents operational freedom in Europe, preventing violent and organised crime, and enhancing internal security. This analysis traces the three pathways as they emerged, focusing on where they intersect and complement each other.

⁸ Gavin Blackburn, “[Denmark’s Intelligence Agency Warns Russia ‘Actively’ Preparing Acts of Sabotage](#),” *Euronews*, 3 September 2026; David Cattler, “[Signals from the North: What Nordic and Baltic Intelligence Assessments Reveal about Russia](#),” International Centre for Defence and Security (ICDS), 20 March 2026.

⁹ Välisluureamet, *International Security and Estonia 2026*.

¹⁰ “[‘Schengen Door Needs Closing More Tightly’: 11 Countries Call for Russian Visa Restrictions](#),” *ERR*, 4 June 2026.

¹¹ European Commission, Directorate-General for Migration and Home Affairs, “[Schengen Short-Stay Visa Applications Rise in 2025 but Remain below Pre-Pandemic Levels](#),” 28 May 2026; Ivan Diakonov, “[EU Countries Issue More Visas to Russians, with France Approving the Most](#),” *Ukrainska Pravda*, 7 May 2026.

¹² Ammar Anwer, “[Germany ‘Identifies Two Suspects’ in Drone Attack Plot at Leipzig Airport](#),” *TVP World*, 2 September 2026; Andreas Braun, “[Ermittler identifizieren mutmaßliche Täter](#) [Investigators identify the alleged perpetrators],” *Tagesschau*, 2 September 2026, via Luca Bertuzzi, “[EU Countries Showed ‘Broad Support’ for Moving Forward with Visa Ban for Russian Combatants, Kallas Says](#),” *Euronews*, 2 September 2026.

¹³ Vabariigi Valitsus, “Eesti: turvalisuse nimel,” Välisluureamet, *International Security and Estonia 2026*; Siseministeerium [Estonian Ministry of the Interior], “[Siseminister Taro: EL tegi Venemaa kombatantide sanktsioneerimisega algust](#) [Interior Minister Taro: EU Made a Start on Sanctioning Russian Combatants],” 27 July 2026; Координаційний штаб з питань поводження з військовополоненими [Coordination Headquarters for the Treatment of Prisoners of War] (Koord_shtab), “[Понад 10 000 російських солдатів у полоні](#) [More than 10 000 Russian soldiers are in captivity],” Telegram, 31 December 2025.

1. THE INCEPTION

At the outset of the full-scale invasion, the EU suspended the Visa Facilitation Agreement with Russia and recommended against issuing multiple-entry visas to Russian nationals, though only as non-binding guidance.¹⁴ European states sharing a land border with Russia (and Belarus) have tightened the crossing restrictions, while Finland closed its border outright.

The security argument has been central since the first restrictions

The security argument has been central since the first restrictions: “the common grounds of protecting the public policy and internal security, as well as the overall safety of our shared Schengen space.”¹⁵ The Baltic states and Poland agreed on the common regional approach, stopped issuing tourist visas, and refused entry to Russians holding other states’ Schengen visas at their borders, subject to exceptions for humanitarian cases and dissidents, family members and residence-permit holders, diplomats and hauliers. Estonia moved first in August 2022.¹⁶ In September, the four prime ministers from the Baltic states and Poland explained the decision in a joint statement, saying that “It takes tremendous resources for our border guard services to keep Europe safe and ensure the Russian citizens entering the Schengen area do not pose a threat to our common security and stability of our societies” and adding that “[t]ravel to the European Union is a privilege,

not a human right.”¹⁷ The group also pledged “to seek a common approach on the EU level and asked the European Commission to propose respective measures on visas and entry restrictions that could be implemented in a unified manner by all Member States of the European Union and Schengen Associated Countries.”

Estonia’s initiative to bar Russian (ex-) combatants from entering the EU began as a regional Nordic-Baltic project, at an interior ministers’ meeting in Tallinn in June 2025, with European Commissioner for Internal Affairs and Migration Magnus Brunner and a Frontex representative also in attendance.¹⁸ Estonia, Latvia, Lithuania, Finland, Norway, Sweden, and Poland issued a joint statement calling for a Schengen-wide ban on visas and residence permits for those “contracted by the Russian armed forces or other armed groups acting on behalf of the regime.”¹⁹ They agreed

Estonia's initiative began as a regional Nordic-Baltic project

that the threat to EU internal security would remain after the war in Ukraine ended, thus calling on the member states to stay ahead of this threat, which is especially acute for nations sharing a border with Russia, explaining the proposal’s geographical origins and its primary campaigners.

Norway was the reluctant partial outlier retaining its 2010 bilateral local border traffic agreement with Moscow; the agreement is in force but inoperative in practice, with no new permits issued.²⁰ Many of the Arctic residents

¹⁴ Council of the European Union, “[Council Adopts Full Suspension of Visa Facilitation with Russia](#),” 9 September 2022; European Commission, [Communication from the Commission: Providing Guidelines on General Visa Issuance in Relation to Russian Applicants following Council Decision \(EU\) 2022/1500 of 9 September 2022](#), C(2022) 6596 final (European Commission, 2022).

¹⁵ Valitsus [Estonian Government], “[Eesti, Läti, Leedu ja Poola peaministri ühisavaldus](#) [Joint Statement of the Prime Ministers of Estonia, Latvia, Lithuania, and Poland],” 8 September 2022.

¹⁶ Valitsus [Estonian Government], “[Valitsus piirab Venemaa kodanikele nii viisade väljastamise kui välispiiril riiki sisenemise](#) [Government Limits Visa Issuance and Entry to Russian Citizens at External Borders],” 11 August 2022.

¹⁷ Valitsus, “Eesti, Läti, Leedu ja Poola peaministri ühisavaldus.”

¹⁸ “[Baltics, Nordics, Poland Call for Russian Soldier Schengen Zone Visa Ban](#),” ERR, 19 June 2025.

¹⁹ Siseministeerium [Estonian Ministry of the Interior], “[Põhja- ja Baltimaade siseministrid Tallinnas: tugev välispiir ja meie sitkus on Euroopa vabaduse müür](#) [Interior Ministers of the Nordic and Baltic Countries in Tallinn: A Strong External Border and Our Resilience Form Europe’s Wall of Freedom],” 19 June 2025.

²⁰ Thomas Nilsen, “[Norway Has No Plans to Abandon Its Visa-Free Agreement with Pechenga, the Heavily Militarised Border Municipality](#),” *The Barents Observer*, 26 April 2026; Norwegian Ministry of Foreign Affairs, [Norwegian-Russian Agreement on Local Border Traffic Regime](#) (Norwegian Ministry of Foreign Affairs, 2010).

on the Russian side are military personnel who have reportedly fought in Ukraine and allegedly committed serious crimes.²¹

To seal the EU border, the Nordic-Baltic interior ministers called for increased “cooperation in exchanging information, carrying out joint activities, and supporting each other to tackle instrumentalised migration,” as well as “sustained investment in modern technological solutions for surveillance and protection.” Most important, however, would be developing a shared threat understanding and perception, which appears to be constantly lagging outside the bloc, seemingly in proportion to distance from the Russian border. Such recognition tends to set in only when Russian attacks arrive on those states’ own soil – and start to multiply.

Most important would be developing a shared threat understanding and perception

With the concrete plan still under development, Minister Tsahkna took the proposal, and the pitch, to the EU’s Foreign Affairs Council in January 2026.²² In the words of Kaja Kallas, High Representative of the Union for Foreign Affairs and Security Policy and Vice-President of the European Commission, it was supported and foreign ministers “agreed to take this proposal further and test the appetite from the member states.”²³

2. BEYOND INDIVIDUAL SANCTIONS

Before that, however, rather than wait for a common EU policy from Brussels, Estonia moved first to strengthen its own security – within its national competences – by issuing

A solo action was always meant to be an interim measure

entry bans as the “quickest way” to limit the movement of threat actors into the country in the near future.²⁴ Yet a solo action was always meant to be an interim measure: Estonia “cannot do this alone for everyone who has fought on Russia’s side,” Joosep Kaasik, Undersecretary for Internal Security, said.

By January 2026, Estonia entered the first 261 Russian “individuals who are hostile towards Europe and who have combat experience, military training and often also a potential prior criminal background” into the Schengen Information System (SIS), as an alert for refusal of entry and stay across the zone.²⁵

To do so, a member state must conclude, “based on an individual assessment,” that the person’s presence “poses a threat to public policy, to public security or to national security,” and adopt “a judicial or administrative decision in accordance with its national law.”²⁶ Such a threat arises, among other cases, where there are “serious grounds for believing that a third-country national has committed a serious criminal offence,” including terrorism, or there are clear indications of their “intention to commit such an offence in the territory of a Member State.” The regulation guarantees the

²¹ Thomas Nilsen, “Hundreds of Arctic Troops Killed, Says Ukrainian Adviser,” *The Barents Observer*, 26 March 2022; Atle Staalesen, “Wanted by Kyiv: War Criminals from the Russian Arctic Border Town of Zapolyarny,” *The Barents Observer*, 29 August 2023.

²² Välisministeerium, “Välisminister Tsahkna ELi välisministritele: Euroopa uks peab Venemaa võitlejate ees suletuks jääma [Foreign Minister Tsahkna to EU Foreign Ministers: Europe’s Door Must Remain Closed to Russian Fighters],” 29 January 2026; Jozwiak, “Wider Europe Briefing.”

²³ European External Action Service, “Foreign Affairs Council: Press Conference by High Representative Kaja Kallas,” 29 January 2026.

²⁴ Alex Raufoglu, “‘Sooner or Later This Problem Will Be on Your Soil’: Estonia Pushes Europe to Bar Russian Fighters,” *Radio Free Europe/Radio Liberty*, 18 July 2026.

²⁵ Välisministeerium, “Välisminister Tsahkna: Schengeni ala sissesõidukeeld peab laienema kõigile Venemaa võitlejatele [Foreign Minister Tsahkna: Schengen Area Entry Ban Must Extend to All Russian Combatants],” 14 January 2026.

²⁶ European Parliament and of the Council, *Regulation (EU) 2018/1861 of the European Parliament and of the Council of 28 November 2018 on the Establishment, Operation and Use of the Schengen Information System (SIS) in the Field of Border Checks* (Official Journal of the European Union, 2018), Art. 24.

person affected a right of appeal and provides “an effective remedy to be requested before a court.” When processing a short-stay Schengen visa application, a consulate or the central authorities shall verify whether an SIS alert exists and refuse a visa if so.²⁷ The alert must be reviewed within three years (five where the underlying national decision so provides) and expires unless actively maintained.²⁸

The entry ban is applicable in the entire Schengen area, which excludes Cyprus and Ireland but includes non-EU Schengen members Iceland, Liechtenstein, Norway, and Switzerland.²⁹ It is worth noting, however, that individual countries can make exceptions, as a sovereign decision, and issue a visa with limited territorial validity, even with a Schengen alert in force, thus underscoring the need for a wider EU-backed solution.³⁰

Separately, a member state minded to grant or extend a residence permit or a long-stay visa to a person subject to another state’s SIS alert shall consult that state first.³¹ The latter has ten calendar days to respond, with silence counting as no objection. But the final decision still rests with the granting state. If the permit is granted, the alert is deleted.

The workload does not end when a name enters the SIS and calls for a fairer distribution of the burden

Hence, the workload does not end when a name enters the SIS. In addition to building and holding an evidentiary file sufficient for an individual assessment, an alerting country has to present its case: (1) to defend the alert against an appeal in court; (2) to answer a consultation from another capital; and (3) to repeat the assessment at a review to prevent an automatic deletion. This calls for a fairer

distribution of the burden. “Since the result is one – a safer Europe, it is important that we can share the workload of adding hundreds of thousands of aggressor soldiers to the ban list,” Estonian Interior Minister Igor Taro said.³²

The Estonian government further argued that the threat was not merely theoretical but required preventive measures against sabotage and organised crime. Additionally, the measure was intended as a clear deterrent signal that criminal and violent acts committed in Ukraine will not be forgotten and will have real and long-term consequences for the perpetrators. The foreign minister promised that the first designations would not be the last and that Estonia was working to ensure entry bans were imposed on as many of those who undermine Europe’s security as possible. In February 2026, a further 1 073 names were added.³³ By July, the total rose to 3 100.³⁴

Estonia hoped that other countries would follow suit and reiterated that the priority was a unified ban on Schengen visas (and EU residence permits) for all identified former Russian combatants.³⁵ Estonian Interior Minister Igor Taro argued that aggression must have a price for the aggressor, which extends not only to the Kremlin, already under political and economic sanctions, but also to hundreds of thousands of Russian military personnel committing crimes in Ukraine: “It cannot be that one day you kill people and the next you are vacationing in civilised Europe.”³⁶ He added that Estonia’s “approach is recognised, understood, and will definitely be supported,” but stressed the need to share the burden of adding hundreds of thousands of aggressor

²⁷ European Parliament and of the Council, [Regulation \(EC\) No 810/2009 of the European Parliament and of the Council of 13 July 2009 Establishing a Community Code on Visas \(Visa Code\)](#) (Official Journal of the European Union, 2009), Arts. 21, 32.

²⁸ [Regulation \(EU\) 2018/1861 \(SIS\)](#), Art. 39.

²⁹ Jozwiak, “Wider Europe Briefing.”

³⁰ [Regulation \(EC\) No 810/2009 \(Visa Code\)](#), Art. 25.

³¹ [Regulation \(EU\) 2018/1861 \(SIS\)](#), Art. 27, 29, 30. The latter two cover the mirror provisions, i.e., consultations after an alert is entered and when it concerns someone already holding a valid permit.

³² Siseministeerium, “[Siseminister Taro: lisasime sissesõidukeeldude nimekirja tuhatkond uut Vene kombatanti](#)” [Interior Minister Taro: We Added a Thousand New Russian Combatants to the Entry Ban List], 6 February 2026.

³³ Siseministeerium, “Siseminister Taro: lisasime sissesõidukeeldude nimekirja tuhatkond uut Vene kombatanti”; ERR, “Estonia Bans over 1,000 More Russian Soldiers.”

³⁴ Raufoglu, “‘‘Sooner or Later This Problem Will Be on Your Soil.’’”

³⁵ Välisministeerium, “Välisminister Tsahkna: Schengeni ala sissesõidukeeld.”

³⁶ Siseministeerium, “Siseminister Taro: lisasime sissesõidukeeldude nimekirja tuhatkond uut Vene kombatanti”; ERR, “Estonia Bans over 1,000 More Russian Soldiers.”

troops to the ban list. The minister said that Estonia possessed “high-quality information” it was ready to offer partners, but the next decision on their part would be political.³⁷

The issue has subsequently been discussed at EU summits and raised at bilateral meetings, with Prime Minister Kristen Michal advocating a lifetime ban.³⁸ The Estonian interior minister shared the sentiment, adding that “Russian combatants’ participation in the war against Ukraine must remain their last foreign trip,” while also distinguishing it from broader tourism restrictions on Russian citizens that should hold “until the end of the war of aggression.”³⁹

3. RALLYING THE TROOPS

In March 2026, heads of state and government of eight member states (Estonia, Finland, Germany, Latvia, Lithuania, Poland, Romania, and Sweden) wrote to European Council President António Costa and European Commission President Ursula von der Leyen.⁴⁰ They cited serious internal security risks, including violent crime, organised criminal networks, extremist movements, and hostile activity in the context of Russia’s hybrid aggression. The leaders invited the Commission, the European External Action Service (EEAS), and relevant Council structures to “swiftly examine and present concrete ways forward that could be implemented at EU level” and asked for “targeted amendments to the Visa Code or

other appropriate legal instruments” to enable a coordinated approach (for the Visa Code, see below). In the meantime, they urged enforcing the existing measures, such as long-term entry bans and the refusal of visas and residence permits. “Inaction would create long-term vulnerabilities that can still be avoided at this stage,” the letter warned. It is significant that Germany signed up to the letter: proposals originating from the Baltic states and Poland are readily dismissed as the ‘reflexive Russophobia of frontline states’, but a signatory from the EU’s largest member, at a remove from the Russian border, makes that dismissal harder to sustain.

At the European Council later that month, Prime Minister Michal reiterated that countering the risk required “solutions throughout the EU” and announced that the European Commission had received clear guidance on ways to prevent Russian fighters from entering Europe.⁴¹

Amid a lack of consensus at the EU level to move faster, and drawing on the lists shared by Estonia, Lithuania followed the template

Amid a lack of consensus at the EU level to move faster, and drawing on the lists shared by Estonia, Lithuania followed the template to register 900 Russians as *persona non grata* nationally and in the SIS.⁴² Lithuanian interior and foreign ministers, Vladislav Kondratovič and Kęstutis Budrys, also called for greater coordination, in part to ensure the data is authentic and correct and to avoid legal disputes.

In June, the Sweden-initiated letter from an informal coalition of now eleven countries (Czechia, Denmark, Estonia, Finland, Latvia, Lithuania, the Netherlands, Poland, and Sweden, plus non-EU Norway and Iceland) appealed to EU foreign policy chief Kallas

³⁷ Valitsus, “Eesti: turvalisuse nimel.”

³⁸ Valitsus, “Euroopa Ülemkogu: vene võitlejad keelu alla ja asjaajamine lihtsamaks [European Council: Russian Fighters Banned and Red Tape Reduced],” 20 March 2026; Siseministeerium, “Siseminister Taru Euroopa kolleegidele: kutsun kõiki sulgema Vene eks-kombatantidele meie ühist julgeolekuruumi [Interior Minister Taru to European Colleagues: I Call on Everyone to Close Our Common Security Space to Russian Ex-Combatants],” 6 March 2026; Jorge Liboreiro, “Russian Soldiers Should Be Banned from Schengen ‘for Life’, Estonian PM Tells Euronews,” Euronews, 24 April 2026.

³⁹ Siseministeerium, “Siseminister Taru: EL tegi Venemaa kombatantide sanktsioneerimisega algust.”

⁴⁰ Office of the President of the Republic of Lithuania, “The President and Other EU Leaders Call for Action against Russian Combatants,” 13 March 2026; “Leaders of eight EU member states, EUCO Joint Letter On A Schengen Entry Ban For Russian Combatants,” via Politico, 13 March 2026.

⁴¹ Valitsus, “Euroopa Ülemkogu: vene võitlejad keelu alla ja asjaajamine lihtsamaks.”

⁴² “Lithuania Backs EU-Wide Entry Ban for Russians Who Fought in Ukraine,” LRT, 15 June 2026; “Lithuania to Ban Russians Who Fought in Ukraine from Entering Country,” LRT, 12 March 2026.

and Migration Commissioner Brunner.⁴³ The signatories recalled that Brussels had already “rightfully” suspended the visa facilitation regime with Moscow and put forward guidelines on the handling of visa applications from Russians, but protested “uneven implementation of these guidelines across” the Union, which “lacks both solidarity and consistency.” The joint ministerial statement cited security concerns over the rising number of visas issued to Russians: 477 878 Schengen tourist visas in 2025, with a significant share being multiple-entry.

Advocating a stricter approach and legislative proposals as soon as possible, the signatories called on the Commission to (1) introduce new restrictive and binding visa measures in the Visa Code, in line with the ideas set out in the new EU Visa Policy Strategy; (2) update and monitor the effective implementation of the existing regime; (3) regularly update the Council with aggregate statistics; and (4) specifically, to “examine and present appropriate measures to respond to the Estonian initiative [...] on identifying former and currently active Russian combatants and hindering them from entering the Schengen area.” Notably, the reference to the Visa Code widens the demand from denying entry to (ex-) combatants to a policy of restricting “visas for non-essential travel” more broadly and targets “visa shopping,” a security risk in itself.⁴⁴

Moreover, the foreign ministers pointed to member states’ being put in “unequal economic positions” amid a lack of solidarity and geopolitical confrontation. This framing may be a response to opposition to the ban in countries of southern Europe, whose economies need to protect tourist flows and revenues.⁴⁵ Finland, for instance, has absorbed the economic cost of the closed border with

Russia.⁴⁶ Additionally, the formulation could echo defence spending in northern Europe and burden-sharing for defence against Russian aggression.

“In short, the Schengen door needs to be closed more tightly,” the Estonian interior minister said in connection with the letter.⁴⁷ He added that Estonia was cooperating with Ukraine’s security agencies on this matter and again called on his European colleagues to act together.

For screening to become truly functional and effective, national security services need access to the kind of database that, so far, only Ukraine possesses

Investment in border surveillance alone will not suffice, nor will intelligence sharing among the EU member states alone. For screening to become truly functional and effective, national security services, as well as consulates, need access to the kind of database that, so far, only Ukraine possesses.⁴⁸ Based on data from the Russian troops taken prisoner of war (POW), Kyiv has built a profile of a Russian service member: age, education, family status, origins, ethnic background, etc.⁴⁹ Together with the databases of POWs and suspected war criminals, such a profile could assist in singling out who among the visa applicants warrants an extended security check.

⁴³ Government Offices of Sweden, “[Joint Ministerial Statement on Proposing New Measures to Limit EU Tourist Visas for Russian Citizens](#),” 8 June 2026; Gerardo Fortuna, “[Weber Yearns for Home](#),” *Politico Brussels Playbook*, 4 June 2026.

⁴⁴ Government Offices of Sweden, “Joint Ministerial Statement.”

⁴⁵ Rikard Jozwiak, “[EU States Push for Tougher Rules to Deny Russians Tourist Visas](#),” *Radio Free Europe/Radio Liberty*, 4 June 2026; Luca Bertuzzi, “[EU Narrows Ban on Russian Combatants to Appease France and Italy](#),” *Euronews*, 8 July 2026; Nikolaj Nielsen, “[Russian Ex-Combatants Set for EU Visa Entry Ban as of October](#),” *EUobserver*, 24 July 2026.

⁴⁶ Célia Gueuti and Sertac Aktan, “[Finnish Communities near Closed Russian Border Continue to Suffer Economically](#),” *Euronews*, 27 February 2026.

⁴⁷ ERR, ““Schengen Door Needs Closing More Tightly.”

⁴⁸ Tetiana Fedosiuk, *On Prisoners of War and More: Institutional Design and Operational Reality of Exchanges* (forthcoming, 2026). There is no publicly recorded precedent of the cross-government sharing the database; however, the Ukrainian Coordination Headquarters for the Treatment of Prisoners of War has worked with foreign partners, particularly intelligence services, on adjacent files, suggesting that some form of cooperation is ongoing; see: “[За два останні роки у понад 30 країнах призупинили найманський рекрутинг РФ – розвідка](#) [Over the past two years, Russian mercenary recruitment has been suspended in more than 30 countries – intelligence],” *Ukrinform*, 29 April 2026.

⁴⁹ Koord_stab, “Понад 10 000 російських солдатів у полоні.”

4. TWO STEPS FORWARD, ONE STEP BACK

Reacting to the Sweden-led letter, the Commission restated its standing commitment to take action, albeit with limited scope and responsibility for issuing visas still resting with member states, while Brussels would provide oversight – part of the revision of the Visa Code.⁵⁰

The revision of the EU Visa Code has run in parallel

The revision of the EU Visa Code has run in parallel. In January 2026, and in “an increasingly volatile geopolitical environment,” the Commission announced its first-ever EU Visa Policy Strategy.⁵¹ The strategy is framed explicitly against “hostile actions by third countries” to which the EU must be able to respond “swiftly and proportionately.”⁵² It will introduce “a new category of targeted restrictive visa measures”: suspension, rejection, or restriction applicable to, among others, “identified former and current combatants of aggressor state” (and applicants travelling for non-essential purposes such as tourism and leisure, echoing, to a degree, the language and spirit of the extended Nordic-Baltic initiative). This should become one of the EU’s “effective tools to serve as both a deterrent and a response mechanism in cases of severe political or security deterioration.” The strategy builds in safeguards and flexibility “for human rights defenders, dissidents, independent journalists, members of civil society organisations, and other humanitarian and exceptional cases.”

Among the supporting tools, the document addresses the screening infrastructure and interoperability framework: (1) the revised Visa Information System (VIS) will “automate the querying of all relevant EU databases, improving the quality and consistency of

decisions”; (2) an EU Visa Support Office within Frontex will provide training, document verification, and “risk assessments and country analyses to promote coherent, evidence-based visa decision-making across the Union.” The Commission is to adopt the binding measure in consultation with member states.

In June, President von der Leyen unveiled the 21st sanctions package, proposing for the first time to ban entry into the EU for “anyone who has served in the Russian Armed Forces since the beginning of the war. So, Europe stays off limits for anyone who has participated in the invasion of Ukraine.”⁵³ Worth noting is that this phrasing extends beyond (ex-)combatants, thereby tacitly acknowledging that it might be very challenging, if not virtually impossible, to prove – to a standard that would survive a legal challenge – that a person was in the trenches in Ukraine, launched drones and missiles while far away from the front line in Russia, or did administrative work or logistics for the occupying troops.

Between announcement and adoption, however, France and Italy, which together accounted for 316 000 – roughly half – of EU visas to Russian nationals in 2025, forced significant concessions, narrowing the measure to short-stay visas (a compromise proposed by Ireland as the presiding state despite being outside Schengen) and a reversal to those who took part in the fighting directly – i.e., excluding administrative and logistical roles; the presumption of military service was reversed, too.⁵⁴ By contrast, carve-outs were widened: humanitarian grounds, the national interest, and international obligations, on top of the defectors already covered in the original proposal.

The objections were practical rather than political in nature: presumption of service unless rebutted by the applicant vs burden of proof on the issuing state. There were fears this would strain consular services' capacity to conduct case-by-case assessments given

⁵⁰ Jorge Liboreiro and Luca Bertuzzi, “EU Vows ‘Targeted’ Restrictions on Schengen Visas for Russians amid Backlash,” *Euronews*, 5 June 2026.

⁵¹ European Commission, “Commission Adopts a First-Ever EU Visa Strategy,” 29 January 2026.

⁵² European Commission, *Communication from the Commission to the European Parliament and the Council on EU Visa Policy Strategy*, COM(2026) 43 final (European Commission, 2026).

⁵³ European External Action Service, “Statement by President von der Leyen on the 21st Sanctions Package against Russia,” 10 June 2026.

⁵⁴ Council of the European Union, “21st Package of Sanctions: EU Hits Russian Energy, Financial Services and Crypto Hard,” 23 July 2026; Bertuzzi, “EU Narrows Ban on Russian Combatants.”

universal male conscription in Russia, as well as the potential for subsequent legal challenges and liability for policy breaches. However, given the northern European states' sustained push(back), under the revised version, the visa issued under the exceptions would be limited to the issuing EU country, while travel to another member state would require that country's consent.⁵⁵

Despite the clear security and foreign-policy dimensions of a decision to impose a visa ban of this reach, it technically remains a migration instrument; thus, revising the Visa Code will follow the ordinary legislative procedure.⁵⁶ Amending it will require a qualified majority voting (QMV) in the Council and the agreement of the European Parliament as a co-legislator.⁵⁷ Compared with the sanctions route, this removes a member state's veto but substitutes it with a longer and more complex legislative process.

As to the sanctions package adopted, the Commission has yet to finalise the details before passing the measures to the Council, and the Council will decide when the ban enters into force once the necessary implementation measures are in place.⁵⁸ The Commission is to revert on preparations for the visa ban within three months, i.e., October 2026.⁵⁹

5. WHERE DO WE GO FROM HERE?

The ban has been adopted in principle, although with significant objections along the north-south European divide. However, it has been deferred until concrete measures enabling implementation are enacted.⁶⁰ It is also said to be a first step, with additional steps ahead.⁶¹

The ban has been adopted in principle, although with significant objections along the north-south European divide

Following an informal meeting of foreign affairs ministers in Ireland in September 2026, High Representative Kallas reaffirmed the "broad support" behind the visa ban initiative.⁶² She also directly linked the tourist visas to acts of sabotage, saying, "If it is true, I hope that this also convinces certain Member States who have been against moving on the visa restrictions that this is actually our security that is in concern as well as Ukraine's."

The remaining work for Brussels is to settle the evidentiary standard and the burden of proof (and who holds it) so the regime can survive judicial review. Yet, upgrading the procedure might be less onerous than it seems, and less resource-intensive than opponents imply.

The screening could rely on the existing instruments

Based on the shared databases of proven (ex-) combatants – resulting in an automatic visa denial – and a profile of a 'typical Russian soldier in Ukraine' – triggering an extra security check – the screening could rely on the existing instruments. Supporting documents are governed by Article 14 and Annex II of the Visa Code: proof of subsistence and documents proving the applicant's employment status (for business trips) are already on the expressly

⁵⁵ Bertuzzi, "EU Narrows Ban on Russian Combatants."

⁵⁶ Liboreiro, "EU Considers Entry Ban." European Union, [Consolidated Version of the Treaty on the Functioning of the European Union](#) (Official Journal of the European Union, 2016), Art. 77.

⁵⁷ [Consolidated Version of the Treaty on the Functioning of the European Union](#), Art. 77.

⁵⁸ Nielsen, "Russian Ex-Combatants Set for EU Visa Entry Ban."

⁵⁹ European Commission, Directorate-General for Financial Stability, Financial Services and Capital Markets Union, ["EU Adopts 21th Package of Sanctions against Russia,"](#) 23 July 2026.

⁶⁰ Bertuzzi, "EU Countries Showed 'Broad Support.'"

⁶¹ Chris Powers, ["Explainer: Why Is the EU Planning to Ban Visas Only for Russian Soldiers, and Not for All Russians?"](#), *The Kyiv Independent*, 11 June 2026.

⁶² European External Action Service, ["Informal Meeting of Foreign Affairs Ministers \(GYMNICH\): Press Conference by High Representative Kaja Kallas,"](#) 4 September 2026.

‘non-exhaustive’ list.⁶³ To assist the internal work of the processing authorities, the harmonised list of supporting documents could be extended, a far lower bar than a policy overhaul, as it is already within the existing institutional powers. An applicant could be asked to provide employment history and bank statements. In suspicious cases, a prolonged unemployment gap could point to time in military service, while deposits matching the wages and bonuses paid to contract soldiers would strengthen the case for refusing the visa. One’s whereabouts are hard to prove and make weak evidence, but a false statement (if later proven as such, including by the first two screening elements and via social media posts if necessary) is grounds for refusal and would insulate the decision from challenge on review.

A prolonged unemployment gap could point to time in military service, while deposits matching the wages and bonuses paid to contract soldiers would strengthen the case for refusing the visa

Estonia and Lithuania, as the first movers, may also be the first to be challenged in court. By filing SIS alerts that cover the Schengen area, they have set a precedent that others – especially in the Nordic-Baltic region – may soon follow and translate into a more coherent, comprehensive, harmonised mechanism, short of an agreed EU policy. As a stopgap, it will help close the visa-shopping loophole.

It does not matter whose (more welcoming) consulate a Russian agent applies to and which country they use to enter the Schengen area, if a particular sabotage plot and target have already been decided, as the recent attack in Germany indicates. To answer the geographically distant sceptics, in Undersecretary Kaasik’s words, “sooner or later this problem will arrive on your soil, and by then it may already be too late.”⁶⁴ Before that,

⁶³ European Parliament and Council, [Regulation \(EC\) No 810/2009 of the European Parliament and of the Council of 13 July 2009 Establishing a Community Code on Visas \(Visa Code\)](#), consolidated version of 28 June 2024 (Official Journal of the European Union, 2009).

⁶⁴ Raufoglu, “‘Sooner or Later This Problem Will Be on Your Soil.’”

however, the criminality argument – rather than the case for punishing the aggressor and deterring further hybrid aggression, let alone a moral justification – may be easier to sell to western and southern Europeans.

The targeted ban could potentially be extended to other service branches and security agencies implicated in oppression in the occupied territories of Ukraine

The ‘combatants’ scope is also evidently a first step. The Nordic-Baltic bloc, which was joined by Czechia, Poland, and the Netherlands, has already moved on to the wider Russian visa question; the combatant ban was chosen because it is legally and politically more feasible.⁶⁵ Short of such an ambitious migration-policy reform, however, the targeted ban could potentially be extended to other service branches and security agencies beyond the Russian armed forces: for instance, Russia’s National Guard (Rosgvardiya), Ministry of Foreign Affairs (MVD), and Federal Security Service (FSB) personnel implicated in oppression in the occupied territories of Ukraine.⁶⁶

CONCLUSION

Despite opposition that is likely to continue, the states of the extended Nordic-Baltic coalition will keep pressing their case against a threat that presses hardest on their security and is closest to their borders.

When Brussels was deliberating Estonia’s initial proposal, one diplomat raised the seemingly impossible challenge of obtaining individual details for each (ex-)combatant: “A few hundred, even a couple of thousands could work, but we are talking about nearly a million

⁶⁵ Luca Steinmann, “[EU Moves to Bar Russian Veterans from Entering Schengen Area](#),” *Brussels Signal*, 16 June 2026; See also: Government Offices of Sweden, “Joint Ministerial Statement.”

⁶⁶ Lorenzo Crippa, “[Putin’s Henchmen: The Russian National Guard in the Invasion of Ukraine](#),” International Centre for Defence and Security (ICDS), 27 March 2024. Sanshiro Hosaka, *Constrained yet Dangerous: The Wartime Evolution of Russia’s Intelligence Ecosystem* (ICDS, 2026).

people here.”⁶⁷ Ukraine’s existing databases would help the EU member states’ security services and border control authorities to credibly identify those thousands, potentially tens of thousands, of ex-combatants. For the remainder, a standing category shifts the question from compiling lists of names to defining the criteria. This promises to ease further concerns and objections, while aiming at a solution and an instrument more durable than sanctions. Of course, not all of the hundreds of thousands of ex-combatants will apply for a Schengen visa and try to enter the EU. According to Russia’s own state pollster, as of autumn 2022, only 29% of Russians held a foreign passport (mostly concentrated in large cities, not where a disproportionate share of contract soldiers is recruited); over five years,

of 23% who travelled abroad, no more than 9% visited countries in the Schengen area; 2% had a Schengen visa, and no more than 1% of respondents planned to obtain or renew one.⁶⁸ But short of a full-scale invasion, it does not take that many people to execute an attack either. So, at the end of the day, it is a trade-off: are the extra hours of consular work worth the damage from an act of sabotage or terror they might prevent?

As High Representative Kallas put it, if there is a ceasefire or some settlement of the active fighting in the war in Ukraine, the question of Russian combat veterans will arise, and the EU needs to prepare for this step and have answers before it happens.⁶⁹

⁶⁷ Jozwiak, “Wider Europe Briefing.”

⁶⁸ “Россия без Шенгена [Russia without Schengen],” VTsIOM / Russian Public Opinion Research Center, 20 September 2022.

⁶⁹ European External Action Service, “Foreign Affairs Council.”

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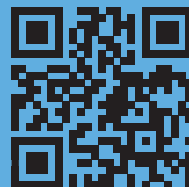
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