

**Mrs Ursula von der Leyen**  
**President of the European Commission**

**Paris, 6th of July 2026**

**Concerns : ban from entry into the EU anyone who has served in the Russian Armed Forces**

Dear President von der Leyen,

On behalf of the Association "Farewell to Arms!" and the political party "Peaceful Russia" we would like to address you important concerns regarding the proposed 21st package of sanctions against Russia, particularly on the ban from entry into the EU of anyone who has served in the Russian Armed Forces.

**"Farewell to Arms!"** is a French Association that supports Russian former military servicemen who have refused to participate in the Russian aggression against Ukraine. For more than three years, we defend deserters, and conscientious objectors. Some were deceived into joining the war under the pretext of military exercises in 2022, others were forcibly mobilized that same year, and some were subjected to abuse and torture within the military in attempts to compel them to take part in combat operations against Ukraine.

**"Peaceful Russia"** party, recently created by Ilya Yashin, former political prisoner and Russian renowned opponent to Putin, pursues three core principles: peace (opposing war, supporting Ukraine's integrity), freedom (respecting human rights), and justice (rule of law and accountability for war crimes).

We have carefully studied your recent statement on the proposed 21st package of sanctions against Russia. Overall, we highly appreciate this initiative and support the European Union's determination to increase pressure on the Kremlin and limit its capacity to continue its aggression against Ukraine.

However, we would like to draw your particular attention to one specific provision:

*"For the first time, we propose to ban from entry into the EU 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. As simple as that."*

We fully understand the reasoning behind this proposal and share the goal of holding perpetrators accountable. At the same time, we know about many Russian former servicemen who reject Putin's regime, resist his rules, and pay for this choice with persecution, exile, or imprisonment.

Such a measure, if adopted without exceptions for deserters, conscientious objectors, and those who refused to fight, would not weaken Vladimir Putin but show that resistance is futile.

Across Europe, human rights defenders have worked tirelessly to assist Russian deserters who refused to participate in the war. As a result of these efforts, twelve Russian deserters have already received travel documents and are now able to speak freely, counter Kremlin propaganda, and encourage others to refuse participation in Russia's aggression.

### **Vulnerability of Russian deserters**

Based on open sources, about 50 000 Russians have run away from the army since 2022. Our data shows that only 2,5 thousand of this number had the possibility to leave Russian territory. Due to soviet heritage, Russian legislation makes it quite impossible for Russian servicemen to obtain a foreign passport. Because of that, many Russian deserters remain in third countries such as Kazakhstan and Armenia, that allow Russian citizens to enter with only Russian inner passports. On the other hand, their legal status in these countries is often uncertain and their protection limited, e.g., Kazakhstan has already returned at least four Russian deserters to Russia.

An entry ban could inadvertently leave these individuals in an even more vulnerable position. It may also be interpreted by authorities in third countries as a signal that those who served in the Russian Armed Forces, even those who

deserted and opposed the war, are no longer deserving of international protection.

### **How EU legislation already protects deserters**

Article 9(2)(e) of Directive 2011/95/EU (the Qualification Directive) recognizes that prosecution or punishment for refusing to perform military service in a conflict where such service would include crimes or acts falling within the exclusion clauses may constitute an act of persecution. This provision reflects the EU's long-standing commitment to protecting individuals who refuse to participate in unlawful armed conflicts.

**For this reason, providing a narrowly tailored humanitarian exemption for deserters and conscientious objectors would not weaken the sanctions regime; rather, it would preserve the coherence of EU law by ensuring that those who may qualify for international protection are not effectively excluded before their individual circumstances can be assessed.**

### **Humanitarian component**

We fully recognize that within the Russian Armed Forces there are individuals responsible for serious violations of international humanitarian law, who cannot expect international protection.

At the same time, we have clear evidence for Russians who went through arrests, torture camps inside Russian forces and now facing up to 15 years imprisonment for being conscientious objectors.

**For the reasons set out above, we respectfully urge that the 21st sanctions package include clear humanitarian exemptions for those deserters who have got a verified antiwar activity.**

Without such distinctions, there is a serious risk that individuals who have actively rejected participation in this war at great personal risk may be left without protection and exposed to further harm. At the same time, it will absolutely weaken Russian armed forces and push other men to avoid the army or to desert.

Our organisations remain fully available at any time to provide any necessary expertise, verifications of concrete cases and consultations to the European Union in order to support the protection of Russian deserters and strengthen the effectiveness of related humanitarian safeguards.

Respectfully,

Sterlyadnikov Alexandr, Association "Farewell to Arms!", president

A handwritten signature in blue ink, appearing to be 'A. Sterlyadnikov', written over a faint yellow rectangular background.

Prokopieva Olga, Party "Peaceful Russia", deputy chair

A handwritten signature in brown ink, appearing to be 'O. Prokopieva', written over a faint yellow rectangular background.