

# **Regulation (EU) No. 833/2014: ban on imports into EU of iron and steel products as listed in Annex XVII originating in Russia, effective 30 September 2023**

**Dear Sir / Madam,**

This EU regulation prohibits the import, transport and purchase into the EU of iron and steel products containing material of Russian origin.

Switzerland has also adopted this package of sanctions. This is governed by Ordinance 946.231.176.72.

Article 14a(2) therein indicates that the import, transport and purchase of iron and steel products referred to in Annex XVII which have been processed in a third country incorporating iron and steel products originating in or consigned from the Russian Federation shall be prohibited.

Consequently, the sanction named applies in both directions.

Compliance with the sanction must, therefore, likewise be ensured when products are imported into Switzerland. The State Secretariat for Economic Affairs SECO has published a guide to "interpreting the sanction measures" (available in German, French, Italian) and, in so doing, has provided clarity and a list of the documents considered to constitute sufficient evidence (information correct as of 2 October 2023). In addition, SECO lists under point 2.1.4 the cases in which evidence must be available at the time of import into Switzerland.

The responsibility for the accuracy of the information in the documents lies with the importer. Swiss customs does not require the customs service provider to include a corresponding code in the Swiss import declaration.

In the other direction, when importing products from Switzerland to the EU, customs clearance service providers must declare, using the appropriate codes, that the goods concerned are accompanied by evidence verifying that no iron and steel products of Russian origin have been used.

Therefore, in this direction of transport, it is indispensable that we have a written verification from the exporter at the time of import customs clearance into an EU country. It is important that the exporter can provide evidence to support the verification. Documents that will be accepted as evidence are listed in the applicable regulation. The Swiss exporter has the burden of proof here.

**Possible verifications provided to us may be worded as follows:**

- *"No iron and steel products originating in Russia were used in the production of the listed goods/parts in accordance with Regulation (EU) No. 833/2014."*

**or**

- *"We hereby verify in a legally binding manner that the iron and steel products listed in this invoice were processed/produced without the use of iron and steel products originating in Russia as listed in Annex XVII to Regulation (EU) No. 833/2014."*

At this point in time, we cannot make any recommendations as to whether verifications worded differently or general verifications will be accepted, as we do not yet have sufficient experience in this area.

The German customs offices reserve the right to ask for evidence when the import customs declaration is made and to decide whether this evidence will be accepted.

If you have any specific questions we recommend to contact SECO directly ([sanctions@seco.admin.ch](mailto:sanctions@seco.admin.ch)).

Kind regards,



**Your team at Schenker Switzerland Ltd  
(Schenker Schweiz AG)**

Customs Competence Center

[ch.dl.zrh.sgz-managers@dbschenker.com](mailto:ch.dl.zrh.sgz-managers@dbschenker.com)