

IMPORT, PURCHASE & TRANSFER OF LISTED GOODS

RELATED ARTICLES: ARTICLE 3g, ARTICLE 3i, ARTICLE 3o OF COUNCIL REGULATION NO. 833/2014¹

FREQUENTLY ASKED QUESTIONS – AS OF 23 JULY 2025

1. Is the purchase of goods listed in Annexes XVII and XXI of Council Regulation No. 833/2014 by an EU company allowed when the goods are destined for a third country and are not transiting Union territory?

Last update: 26 July 2023

No. Articles 3g and 3i of Council Regulation No. 833/2014 prohibit the purchase, import, or transfer, directly or indirectly, of the goods listed in Annexes XVII and XXI if they originate in Russia or are exported from Russia. The prohibition on purchase applies irrespective of the final destination of the goods. Provided the purchase falls within the scope of Article 13 of Regulation 833/2014, it is not relevant whether the goods are destined for the EU or not. This supports the aim of the sanctions which is to significantly weaken Russia's economic base, depriving it of critical markets for its products and to significantly curtail its ability to wage war. Any other interpretation would render the prohibition largely devoid of purpose and create significant loopholes.

Please note that the situation is different for the purchase of Russian seaborne crude oil (question n°15 of the FAQ on “oil imports”).

2. Is the transfer of goods listed in Annexes XVII and XXI of Council Regulation No. 833/2014 by an EU company allowed when the goods are destined for a third country and are not transiting Union territory?

Last update: 26 July 2023

No. Articles 3g and 3i of Council Regulation No. 833/2014 prohibit the purchase, import, or transfer, directly or indirectly, of the goods listed in Annexes XVII and XXI if they originate in Russia or are exported from Russia. The prohibition on transfer applies irrespective of the final destination of the goods, whereas the prohibition on the import applies by nature to goods moving “into the Union”. Provided the transfer falls within the scope of Article 13 of Council Regulation No. 833/2014, it is not relevant whether the goods are destined for the EU or not. This supports the aim of the sanctions which is to significantly weaken Russia's economic base, depriving it of critical markets for its products and to significantly curtail its ability to wage war. Any other interpretation would render the prohibition largely devoid of purpose and create significant loopholes.

¹ Please note that the import prohibition on diamonds is covered by a separate FAQs chapter.

However, the Union is committed to avoiding that its sanctions impact food and energy security of third countries around the globe, in particular of the least developed ones. In light of this commitment, which is clearly stated in recitals 11 and 12 of Council Regulation No. 2022/1269, the transfer to third countries of certain goods listed in Annex XXI should be allowed “to combat food and energy insecurity around the world” and “in order to avoid any potential negative consequences therefor” in third countries.

In order to ensure energy security, transfer to third countries of specific energy-related goods, as well as the financing or financial assistance related to such transfer, carried out by EU operators should be allowed. Given their specific supply chains and the available transport options, such transfer should only be permitted from point to point (eg, from Russia to a third country), without transiting via the EU territory. The relevant goods are the following:

- Energy goods falling under CN codes 4401 (fuel wood) and 4402 (charcoal), as listed in Annex XXI
- All the following coal and related products listed in Annex XXI (previously listed in Annex XXII - as explained in recital 51 of Council Regulation 1214/2023 (“11th sanctions package”) which entered into force on 24 June 2023, Article 3j and Annex XXII were deleted because the prohibition concerning coal imports is covered by Article 3i and Annex XXI of Regulation (EU) No 833/2014). These goods are:

CN Code	Name of the good
2701	Coal; briquettes, ovoids and similar solid fuels manufactured from coal
2702	Lignite, whether or not agglomerated, excluding jet
2703 00 00	Peat (including peat litter), whether or not agglomerated
2704 00	Coke and semi-coke of coal, of lignite or of peat, whether or not agglomerated; retort carbon
2705 00 00	Coal gas, water gas, producer gas and similar gases, other than petroleum gases and other gaseous hydrocarbons
2706 00 00	Tar distilled from coal, from lignite or from peat, and other mineral tars, whether or not dehydrated or partially distilled, including reconstituted tars
2707	Oils and other products of the distillation of high temperature coal tar; similar products in which the weight of the aromatic constituents exceeds that of the non-aromatic constituents
2708	Pitch and pitch coke, obtained from coal tar or from other mineral tars

Recital 12 of Council Regulation No. 2022/1269 further clarifies that EU sanctions “do not target in any way the trade in agricultural and food products, including wheat and fertilisers, between third countries and Russia”. It follows that the transfer to third countries, as well as the financing or financial assistance related to such transfer, carried out by EU operators or via the EU territory (including in transit) should not in any way be hindered for the following goods:

- Fertilisers falling under CN codes 310420, 310520; 310560; ex31059020 and ex31059080 related, as listed in Annex XXI;
- Animal feed falling under CN code 2303, as listed in Annex XXI.

The above is without prejudice to the guidance on transit of goods to and from Kaliningrad and to the ability of Member States to take the necessary measures to protect their national security interests.

3. Does “purchase” or “transfer” also refer to restricted goods that are already released for free circulation within the territory of the Union before the restrictive measures?

Last update: 26 July 2023

No. The restrictions envisaged in Articles 3g, 3i, 3m and 3p of Council Regulation No. 833/2014 do not concern goods which are already released for free circulation within the territory of the Union (i.e. usually already placed on the market) at the time when the respective measure becomes applicable.

4. What is the scope of the prohibition on relevant services (e.g. financial assistance, including brokering or insurance) as stated in Articles 3g and 3i of Council Regulation No. 833/2014 for the transport or transfer of goods or products listed in Annexes XVII or XXI to third countries?

Last update: 26 July 2023

The provision of insurance, brokering services or other financing or financial assistance by EU operators for the transport or transfer of good or products listed in Annexes XVII or XXI to third countries is prohibited. Regardless of whether the transfer of these goods or products is performed by an EU or a non-EU operator, where the provider of assistance related to such a shipment is an EU operator, they remain bound by the prohibition.

However, the Union is committed to avoiding that its sanctions impact food and energy security of third countries around the globe, in particular of the least developed ones. In light of this commitment, which is clearly stated in recitals 11 and 12 of Council Regulation No. 2022/1269, the transfer to third countries of certain goods listed in Annex XXI should be allowed “to combat food and energy insecurity around the world” and “in order to avoid any potential negative consequences therefor” in third countries.

In order to ensure energy security, transfer to third countries of specific energy-related goods, as well as the financing or financial assistance related to such transfer, carried out by EU operators should be allowed. Given their specific supply chains and the available transport options, such transfer should only be permitted from point to point (eg, from Russia to a third country), without transiting via the EU territory. The relevant goods are the following:

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2706 00 00	Tar distilled from coal, from lignite or from peat, and other mineral tars, whether or not dehydrated or partially distilled, including reconstituted tars
2707	Oils and other products of the distillation of high temperature coal tar; similar products in which the weight of the aromatic constituents exceeds that of the non-aromatic constituents
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Recital 12 of Council Regulation 2022/1269 further clarifies that EU sanctions “do not target in any way the trade in agricultural and food products, including wheat and fertilisers, between third countries and Russia”. It follows that the transfer to third countries, as well as the financing or financial assistance related to such transfer, carried out by EU operators or via the EU territory (including in transit) should not in any way be hindered for the following goods:

- Fertilisers falling under CN codes 310420, 310520; 310560; ex31059020 and ex31059080 related, as listed in Annex XXI;

- Animal feed falling under CN code 2303, as listed in Annex XXI.

The above is without prejudice to the guidance on transit of goods to and from Kaliningrad and to the ability of Member States to take the necessary measures to protect their national security interests.

5. Does a purchase, import or transfer restriction in Council Regulation No. 833/2014 which provides for an exception allowing the execution of a prior contract until a specified date allow for the payment on the basis of such contract by the EU operator to its Russian counterpart after this date?

Last update: 26 August 2022

It is the Commission's view that an exception to a purchase, import or transfer restriction allowing for the execution of prior contracts until a specified date would not allow for a payment to be made to the Russian counterpart beyond that date. Since the payment is part of the execution of the contract, EU operators are prohibited from making such a payment thereafter, even if the goods originating in Russia have already been received. Questions on the concrete application of EU sanctions in specific cases should be addressed to the relevant national competent authority.

6. What is the scope of 'import of goods in the Union' in the context of 'import' related prohibitions in Council Regulation No. 833/2014?

Last update: 21 December 2022

Sanctions regulations do not contain a specific definition of the notion of "import". Given the numerous, frequent and significant amendments to the sanctions provisions, particularly in the context of the Russian aggression in Ukraine, without prejudice to the Union Customs Code definitions and formalities applying in other areas, the conditions for determining the legal import into the Union of a good **as regards sanctions** should be assessed in relation to the time the goods are brought into the Union and presented to customs, regardless of the subsequent customs procedure these goods will be placed under. Indeed, unlike other import requirements, which are established in order to protect the internal market and EU consumers, and are thus assessed at the time of the goods' release for free circulation, the objective of the import restrictions in Council Regulation No. 833/2014 is to deprive Russia of income which it can use to finance its war in Ukraine.

Consequently, goods which lawfully entered the EU territory and were presented to customs (a) before the entry into force of the relevant sanctions restrictions, or (b) before the date of application of such restrictions (when a wind-down for the execution of existing contracts is foreseen, for instance) can be released to the EU importers.

However, in view of Article 12 of Council Regulation No. 833/2014, national competent authorities should not allow such a release of the goods if they have reasonable ground to suspect that doing so would constitute circumvention. Moreover, any subsequent payments related to the released goods have to comply with the applicable restrictive measures, in particular asset freezes provisions in Council Regulation No. 269/2014.

7. Why did the EU introduce a gold import ban and what does it cover?

Last update: 27 July 2022

The G7 has agreed the necessity of co-ordinated action to further increase economic pressure on Russia. The gold ban further aligns EU sanctions with those of our G7 partners.

As of 22 July 2022, EU sanctions prohibit the direct or indirect import, purchase or transfer of gold, which constitutes Russia's most significant export after energy, pursuant to Article 3o of Regulation (EU) 833/2014. The prohibition applies to gold listed in Annex XXVI of the regulation, i.e. gold plated with platinum, unwrought or in semi-manufactured forms, in powder form, waste and scrap of gold including metal clad with gold but excluding sweepings containing other precious metals, and gold coins.

This prohibition applies to gold if it (i) originates in Russia and (ii) has been exported from Russia into the Union or to any third country after 22 July 2022. This implies that for such a good imported into the EU from 22 July 2022 and onwards not to be covered by the prohibition, the importer shall provide to customs authorities a proof that the good was exported from Russia before 22 July 2022. Therefore, this prohibition does not apply to e.g. gold of Russian origin already held by central banks, investors, companies or pension funds across Member States, if it was exported from Russia before 22 July 2022.

The prohibition also applies to financing, technical and other related assistance pursuant to Art. 3o paragraph 4 of the regulation.

8. Is processed gold concerned by the prohibition?

Last update: 27 July 2022

Yes, the prohibition applies to processed gold according to Art. 3o paragraph 2 of the regulation, if it fulfils the following conditions: (i) products listed in Annex XXVI, (ii) processed in a third country and (iii) incorporating the products prohibited in paragraph 1 of Art. 3o, meaning gold originating in Russia listed in Annex XXVI and exported from Russia after 22 July 2022.

For such goods imported into the EU from 22 July 2022 and onwards not to be covered by the prohibition, the importer must provide to customs a proof that the export from Russia to the third country took place before 22 July 2022.

9. Is gold jewellery included in the ban? Can I travel with golden jewellery to and from Russia?

Last update: 27 July 2022

Yes, import, purchase or transfer, directly or indirectly, into the Union, of golden jewellery originating in Russia and exported from Russia after 22 July 2022 is prohibited, pursuant to Art. 3o paragraph 3 and listed in Annex XXVII of the regulation.

The prohibition however does not apply to golden jewellery for personal use of natural persons travelling to the European Union or to members of their immediate families travelling with them, as long as it is owned by those individuals and not intended for sale. A similar exemption also applies to export of golden jewellery included in the luxury goods list in Annex XVIII of the regulation.

10. Are there other exceptions to the gold ban?

Last update: 27 July 2022

The prohibition in Art. 3o also does not apply to gold which is necessary for the official purposes of diplomatic missions, consular posts or international organisations in Russia enjoying immunities in accordance with international law. Competent authorities of Member States may also authorise the transfer or import of gold that is designated as cultural goods, which are on loan in the context of formal cultural cooperation with Russia. The re-export of those temporarily imported gold cultural goods would also have to be subject to a subsequent authorisation for export by a competent authority, as per Article 3h paragraphs 1 and 4 of the regulation.

11. How were the import bans amended in the 11th package?

Last update: 23 July 2023

Council Regulation 1214/2023 of 23 June 2023 (“11th sanctions package”), deleted the overlaps between the different parts of the list of iron and steel products in Annex XVII: ‘Part A’ was deleted while former ‘Part B’ of Annex remains. In addition, Parts A, B and C of Annex XXI were merged.

The specific transitional periods that applied to the different parts of the Annexes XVII and XXI of Regulation (EU) No 833/2014 and had expired, were removed:

- execution until 17 June 2022 of contracts concluded before 16 March 2022 for certain iron and steel products listed in former Part A of Annex XVII (former paragraph 2 of Article 3g);
- execution until 8 January 2023 of contracts concluded before 7 October 2022 for certain iron and steel products listed in former Part B of Annex XVII (former paragraph 3 of Article 3g);
- execution until 10 July 2022 of contracts concluded before 9 April 2022 for goods listed in Part A of Annex XXI (former paragraph 3 of Article 3i);

- execution until 8 January 2023 of contracts concluded before 7 October 2022 for goods listed in Part B of Annex XXI (former paragraph 3b of Article 3i);
- execution until 27 May 2023 of contracts concluded before 26 February 2023 for goods listed in Part C of Annex XXI (former paragraph 3d of Article 3i);
- execution until 18 June 2023 of contracts concluded before 7 October 2022 for goods falling under CN code 2905 11 listed in Part B of Annex XXI (former paragraph 3ba of Article 3i).

As explained in recital 51 of Council Regulation 1214/2023 Article 3j and Annex XXII were deleted because the prohibition concerning coal imports is since then covered by Article 3i and Annex XXI of Regulation (EU) No 833/2014. The prohibition is therefore still in force, though under a different legal provision. The exceptions for the purchase, import or transport into the Union of coal and other solid fossil fuels, containing a transitional period until 10 August 2022 were deleted:

- Article 3ea (port access ban), paragraph 5, former point (e);
- Article 5aa (transaction ban), paragraph 3, former point (c);
- Article 5k (public procurement ban), paragraph 2, former point (f).

As explained in recital 51 of Regulation 1214/2023 the deletion of references to transitional periods which have already expired is not intended to have any legal effects on past or ongoing contracts or on the applicability of those transition periods.

12. Can Russian nationals temporarily bring personal goods listed in Annex XXI and subject to the prohibition in Art. 3i of Council Regulation 833/2014 into the Union, e.g. for touristic travels?

Last update: 22 December 2023

As per the case law of the European Court of Justice, sanctions need to be interpreted broadly, among other reasons in order to ensure effectiveness of the adopted prohibitions and avoid circumvention. It is for the national competent authorities to assess each situation and to implement the prohibitions accordingly.

Article 3i of Council Regulation 833/2014 prohibits the purchase, import, or transfer, directly or indirectly, of goods as listed in Annex XXI to the Regulation if they originate in Russia or are exported from Russia. Annex XXI lists a broad range of goods.

Council Regulation No. 2878/2023 of 18 December 2023 (“12th sanctions package”), introduced an exception for personal effects. This means that the import of certain goods owned by natural persons travelling to the Union and their immediate family members may be allowed if they are for the strict personal use of those individuals. This exception applies to listed goods which raise insignificant circumvention concerns, like personal hygiene items or clothing worn by travellers or contained in their luggage as they are manifestly not intended for sale.

National competent authorities should continue to apply the prohibition in a proportionate and reasonable manner.

13. What is the situation for vehicles? Can I drive into the Union with my car registered in Russia?

Last update: 22 December 2023

Article 3i of Council Regulation 833/2014 prohibits the purchase, import, or transfer, directly or indirectly, of goods as listed in Annex XXI to the Regulation if they originate in Russia or are exported from Russia. This includes motor vehicles (cars) falling under CN code 8703. The Council clarified with Council Regulation No. 2878/2023 of 18 December 2023 (“12th sanctions package”) that the following cases are permissible:

- **Exemption for diplomatic cars:** The prohibition does not apply to the entry of cars with diplomatic license plates necessary for the functioning of diplomatic and consular representations, including delegations, embassies and missions, or of international organisations enjoying immunities in accordance with international law or for the personal use of their staff and their immediate family members (see paragraph 3ac);
- **Derogation for cars owned by EU citizens and their families:** National competent authorities may grant authorisations for the entry of cars owned by EU citizens or their immediate family members residing in Russia, provided they are driving the car into the Union for strict personal use and without intention to sell (see paragraph 3ab). An example is an EU citizen living in Russia visiting their home country by car for holidays.

14. How were the import related bans amended in the 16th package?

Last update: 23 July 2025

Council Regulation (EU) 2025/395 of 24 February 2025 (“16th sanctions package”), introduced the following amendments to the import-related prohibitions under Article 3i of Council Regulation (EU) No 833/2014:

- (a) Adding CN 7601 ‘Unwrought aluminium’ to the list of goods in Annex XXI subject to the prohibitions in Article 3i (1) and (2). For more information regarding the scope and application of this ban, please see questions 15, 16 and 17 below.
- (b) The specific transitional periods applicable to the different parts of Annex XXI of Regulation (EU) No 833/2014 and already expired were removed:
 - execution until 20 December 2024 of contracts concluded before 19 December 2023 for goods falling under CN codes 2711 12, 2711 13, 2711 14, 2711 19 and 7202 (former paragraph 3cb of Article 3i);
 - execution until 26 September 2024 of contracts concluded before 25 June 2024 for goods falling under CN codes 28042910 and 284540 (former paragraph 3cf of Article 3i);
 - use of quotas allowed until 30 June 2024 for the import into the Union of goods falling under CN codes 2803 and 4002 (former paragraph 3da of Article 3i).
- (c) Adding five new CN codes (7019, 8415, 8483, 8518, 8539) to the scope of goods covered for the derogation under Article 3i(3e) and for which competent authorities may grant an authorisation.

- (d) Adding a targeted derogation under Article 3i(3f) for certain goods (CN codes 9026, 9027 and 9031) only when strictly necessary for the purposes of maintenance, repair or the periodic certification of primary and secondary crude oil measuring points on the Druzhba pipeline into the Union.

15. What exactly is the scope of the new prohibition related to primary aluminium? Is it only the import of primary aluminium (CN code 7601) in the Union which is prohibited?

Last update: 23 July 2025

Council Regulation (EU) 2025/395 of 24 February 2025, the most recent amendment to Council Regulation (EU) No 833/2014, amends Article 3i and Annex XXI by adding CN 7601 ‘Unwrought aluminium’ to the list of goods subject to the prohibitions in Article 3i (1) and (2) in their entirety. Thus, the prohibition relates to: import into the Union, purchase, transfer of primary aluminium to third countries, similarly to other goods already subject to restrictions in the article.

This provision is subject to two exceptions:

1. Article 3i (3cg) provides that the prohibitions in paragraphs 1 and 2 of that Article shall not apply to the import, purchase or transport, or related technical or financial assistance, necessary for the import into the Union of 275 000 metric tonnes of goods falling under the CN code 7601 between 25 February 2025 and 26 February 2026’. That is to be understood that activities, otherwise prohibited in paragraphs (1) and (2), are allowed **when necessary for the import into the Union** of goods falling under CN 7601 within the quota quantities envisaged for the respective period, and only for that purpose.
2. Article 3i(3ch), related to prior contracts that may still be executed for a certain period of time even after the quota for imports has elapsed: For the execution of contracts concluded before 25 February 2025 or of ancillary contracts necessary for the execution of those contracts there is an additional transition period envisaged. As regards these prior contracts, the prohibitions in paragraphs 1 and 2 of Article 3i do not apply to the execution from 26 February 2026 until 31 December 2026 of these contracts, provided that the quantities to be imported stay within the quota quantities envisaged for the respective period, which amount to 50 000 metric tonnes.

16. Does the new prohibition affect stocks of primary aluminium that are already within the territory of the Union before 25 February 2025?

Last update: 23 July 2025

As for all other restrictive measures prohibiting the import, transfer or purchase, the new prohibition does not concern goods which are already released for free circulation within the territory of the Union (i.e. usually already placed on the market) at the time when the respective measure enters into force (see question 3 above). For goods already in the Union but not yet released for free circulation, the provisions of Article 12e of Council Regulation No. 833/2014 apply, and the volumes thereby entering into free circulation should not count towards the quota volumes if the procedures and conditions set out in Article 12e are fulfilled.

17. Does the new prohibition affect imports into the Union of primary aluminium from third countries?

Last update: 23 July 2025

As for all other goods listed in Annex XXI, the prohibitions in Article 3i apply to goods that originate in Russia or are exported from Russia. This prohibition in Article 3i on primary aluminium, as well as for all other goods listed in Annex XXI, is different from the prohibition in Article 3g(1)(d) related to certain steel and iron products and does not impact aluminium products processed in third countries and made from Russian raw aluminum.

For any imports from third countries the applicable EU non-preferential rules of origin need to be observed to determine when a certain good has an origin different from Russian, in order to be allowed for import in the Union. As for all other restrictive measures, national authorities need to exercise due care and perform necessary controls to avoid a breach or circumvention of the measures.

Article 3g(1)(d) iron and steel products processed in third countries incorporating iron and steel inputs from Russia

Article 3g(1)(d) prohibits the import or purchase in the Union of products processed in a third country using iron and steel inputs originating in Russia.

A) GENERAL

1. Does the ban under Article 3g(1)(d) apply to all iron and steel products?

Last update: 2 October 2023

No. The restrictive measure under Article 3g(1)(d) applies only to iron and steel products as listed in Annex XVII when processed in a third country that incorporate iron and steel inputs originating in Russia as listed in Annex XVII. This corresponds to tariff headings 7206-7229 within Chapter 72, and the full Chapter 73.

For products listed in Annex XVII the third country where they have been processed prior to their import in the Union is not relevant. In all cases, it has to be proved that they do not incorporate those iron and steel inputs originating in Russia that are listed in Annex XVII.

Example 1: Fasteners (heading 7318) from a third country (e.g. China, India), manufactured from wire rod (e.g. 7221) originating from Russia intended for import into the Union.

The import in this example would be prohibited as both CN codes 7318 and 7221 are included in Annex XVII and the wire rod originates in Russia, unless covered by a specific exception or derogation.

Example 2: A product of Russian origin that is not a good listed in Annex XVII when it leaves Russia is then processed in a third country, such that the product then becomes a good listed in Annex XVII. Importing this into the Union is not prohibited, because the product now entering the Union has incorporated inputs with Russian origin that are not in Annex XVII.

For example, some pig iron (HS 7201) or steel scrap (HS 7204) leaves Russia and enters Country X. Here, it is transformed into slabs (HS 7207), before being imported into the Union.

The import in this example would not be prohibited.

Example 3: A product of Russian origin that is a good listed in Annex XVII when it leaves Russia is used as a component in a third country, such that the final product then becomes a good not listed in Annex XVII. Importing this into the Union is not prohibited, because the product now entering the Union is not listed in Annex XVII.

2. Are reusable packaging, e.g. containers, made of iron and steel and containing other, non-prohibited goods, also subject to the prohibition in Art. 3g?

Last update: 2 October 2023

The prohibition applies to the goods declared in the customs declaration for the considered procedure. For example, items that can be considered as durable metal packaging, regularly used as part a standard business practice and are only meant to contain the goods that are to be imported, purchased or transferred should not be the subject of the prohibition in Article 3g.

However, if these items (e.g. empty containers) are themselves the object of the import (for example the importation of steel containers with the purpose of releasing them for free circulation), they are not mere packaging and are therefore subject to the prohibition.

National authorities should exercise care to avoid possible circumvention.

3. Does the prohibition also apply to restricted goods that are already within the territory of the Union before entry into force of the relevant restrictive measures?

Last update: 2 October 2023

As for all other restrictive measures prohibiting the import, transfer or purchase, the restriction envisaged in Article 3g(1)(d) of Council Regulation No. 833/2014 does not concern goods which are already released for free circulation within the territory of the Union (i.e. usually already placed on the market) at the time when the respective measure enters into force.

For goods already in the Union but not yet released for free circulation, the provisions of Article 12e of Council Regulation No. 833/2014 apply.

4. Does ‘import’ or "purchase" also refer to goods which are not purchased but are imported only temporarily for the purpose of repair and are re-exported to the third country after repair?

Last update: 2 October 2023

Yes. As for all other restrictive measures prohibiting the import, transfer or purchase, ‘import’ is to be understood broader than ‘release for free circulation’ and covering all customs procedures and formalities.

5. When does the prohibition under Article 3g(1)(d) start applying?

Last update: 22 December 2023

The prohibition to import or purchase iron and steel products processed in third countries using iron or steel originating in Russia enters into application at different moments depending on the inputs used, as follows:

The prohibition to import or purchase enters into application:

- as of 30 September 2023 for products of Annex XVII containing products other than those of CN codes 7207 11, 7207 12 10 or 7224 90
- as of 1 April 2024 for products of Annex XVII containing products of CN code 7207 11
- as of 1 October 2028² for products of Annex XVII containing products of CN codes 7207 12 10 or 7224 90

As products of CN codes 7207 11, 7207 12 10 and 7224 90 are semifinished products, this implies that as of 30 September and before 1 April 2024 for products using the inputs of CN code 7207 11 and before 1 October 2028 for products using the inputs of CN codes 7207 12 10 or 7224 90, the Russian Federation may appear in the Mill Test Certificate (MTC) as the name of the country corresponding to the heat number (country of the ladle of melting). However, the Russian Federation should not appear as the country where the other processing operations have been carried out (i.e. hot rolling, cold rolling, etc) in order to allow the import, transfer or purchase of the product.

After 1 April 2024 for products using inputs of CN code 7207 11 and after 1 October 2024 for products using inputs of CN codes 7207 12 10 or 7224 90, as well as from 30 September 2023 for products using all other iron or steel inputs of Annex XVII, the Russian Federation should not appear in the MTC as the name of the country corresponding to the heat number (country of the ladle of melting) and should not appear either as the country where the other processing operations have been carried out.

² Changed with Council Regulation (EU) 2023/2878 of 18 December 2023 (“12th sanctions package”).

6. Does the application of Article 3g (1) (d) of Regulation (EU) No 833/2014 also extend to products that were manufactured or processed in a third country before 30 September 2023?

Last update: 2 October 2023

The prohibition applies to imports of iron and steel products incorporating inputs originating from Russia that enter the Union as of 30 September 2023, provided that they were manufactured or produced after 23 June 2023. That is the date when the obligation for the importer to demonstrate the country of origin of the iron and steel inputs used for the processing of the product in a third country was introduced in EU law. Coupled with the almost one-year wind-down period of the prohibition itself, this should have allowed an orderly planning of imports into the Union of the relevant goods before 30 September 2023.

If the abovementioned goods are already in the territory of the Union and have been presented to customs before 30 September 2023, Article 12e applies and they can be purchased or transferred after that date (see Q3).

7. Should the time of import be based on the first import into the EU, or should each import of the same goods be considered separately?

Last update: 2 October 2023

Compliance with the restrictive measure needs to be ensured for each import, even if the goods were only temporarily out of the Union or were imported in several batches.

For the case of goods that have been imported into the Union for the first time before the relevant deadline (e.g. 30 September 2023), are sent to a subcontractor in a third country for repair under outward processing, and are meant to be imported into the EU again after 30 September 2023, once the repair has been completed. Compliance with the prohibition is required when goods are imported after their repair.

For the case of several consignments of identical goods, national competent authorities can nevertheless consider and accept the provision of one evidence, i.e. when the products supplied by the same supplier during a period of time are similar and national competent authorities have no reason to suspect possible circumvention; or when the same batch of products is imported in various transports for logistic or other legitimate reasons. National authorities need to exercise due care to avoid a breach or circumvention of the measures as a consequence.

B) EVIDENCE AND PROOF OF ORIGIN OF IRON AND STEEL INPUTS

8. What do I need to know before I plan to import into the Union iron and steel products as listed in Annex XVII when processed in a third country?

Last update: 2 October 2023

In order to ensure the implementation of the prohibition, the same Article establishes an obligation for the importer in the EU to provide evidence of the country of origin of the iron and steel inputs used in a third country for the processing of the iron and steel products imported in the Union.

The following documents may be considered as sufficient evidence of the country of origin of the iron or steel used as inputs:

a) In the case of semifinished products:

The mill test certificate (MTC) (there is no concrete standardized format):

- establishing the name of the facility where the production is taking place, the name of the country corresponding to the heat number (country of the ladle of melting) together with the classification at subheading level (six-digit code) of the product.

b) In the case of finished products

The mill test certificate (MTC) or mill test certificates (MTCss) – if all relevant information cannot be summarized in one single MTC or the MTC accompanied with other documents:

- establishing the name of the country and the name of the facility corresponding to the heat number (country of the ladle of melting) together with the classification at subheading level (six-digit code), and
- the name of the country and the name of the facility where the following processing operations are carried out, as relevant:
 - Hot-rolling
 - Cold-rolling
 - Hot-dipped metallic coating
 - Electrolytic metal coating
 - Organic coating
 - Welding
 - Piercing/extruding
 - Drawing/Pilgering
 - ERW/SAW/HFI/Laser welding

The importer is responsible for the information provided in the MTC or MTCs and submitted to the customs authorities of the Member State of import as evidence of the country of origin of the iron and steel inputs used.

The customs authorities may, in the event of reasonable doubt, require additional evidence such as supplementary separate mill test certificates for the different transformation steps which the product has undergone. All MTCs should be coherent with one another. The importer should apply due diligence to ensure the accuracy of the information provided.

No evidence is needed for purchases regarding goods that have already been imported into the Union. No evidence is needed for the transfer from one Member State to another of goods that have already been imported into the Union.

9. Is the mill test certificate (MTC) the only document that is accepted as evidence that the goods to be imported in the Union do not incorporate iron and steel inputs as listed in Annex XVII originating in Russia?

Last update: 2 October 2023

No. The MTC is an example that can be regarded as sufficient evidence. However, it is for the relevant national competent authorities to establish which other documentation can be considered as evidence of the country of origin of the iron and steel inputs used in a third country for the processing of the iron and steel products imported in the Union.

The origin of the inputs may be established through other means, such as a statement or declaration by the exporter or manufacturer confirming that, after exercising due diligence, the imported product does not contain any Russian steel or iron. Other documents may be invoices, delivery notes, supplier's declarations, including supplier's declarations covering several consignments (long term supplier's declarations) business correspondence, production descriptions, quality certificates and clauses in implemented purchase orders or contracts, provided that they include information of the origin of goods, etc. The type of document(s) may also vary depending on the nature of the product, in particular for finished products (e.g. sewing needles, tubes, etc.).

National competent authorities should assess evidence in a proportionate and reasonable manner, and exercise due care to avoid a breach or circumvention.

In view of ensuring uniform implementation, the Commission will closely monitor national implementation practices.

10. Where do I need to indicate the MTC and/or any other document used as evidence?

Last update: 2 October 2023

The availability of a document used as evidence is to be declared in box 44 of the customs declaration for placing the goods under the respective customs procedure (e.g. release for free circulation, inward processing, etc.) by indicating the code Y 824 for ‘evidence of the country of origin of the iron and steel inputs used’ and in the possession of the importer.

11. Is the evidence needed for all processing operations throughout the whole supply chain or for the processing in the last country before the import into the Union?

Last update: 2 October 2023

The evidence for the non-Russian origin is necessary for the inputs/components that are listed in the Annex used for the production of the specific product which is to be imported in the Union. If, based on the EU rules of non-preferential origin, these inputs/components originate in a third country other than Russia, it is not necessary to supply evidence on the concrete origin of the inputs/components used in that third country to produce them.

Example: Indian screws (CN Code 7318) made with alloy steel (CN Code 7224) are imported into the EU. It is necessary to demonstrate that the alloy steel (CN Code 7224) is not of Russian origin. It is not necessary to prove the origin of any non-alloy steel (CN Code 7216) used for the production of the alloy steel (CN Code 7224).

12. What does the newly introduced status of “partner countries for the importation of iron and steel” in Art. 3g(1)(d) mean for the import and purchase of iron and steel products processed in third countries?

Last update: 26 July 2024

When iron and steel products processed in a third country and incorporating iron and steel products originating in Russia as listed in Annex XVII are imported or purchased from a partner country, importers are not required to provide evidence of the country of origin of the iron and steel inputs used for the processing of the products.

A “partner country for importation of iron and steel” as defined in Art. 1(zc) applies a set of restrictive measures on imports of iron and steel inputs from Russia and a set of import control measures that are substantially equivalent to those of the Union. Currently, the Regulation lists three partner countries – Norway, Switzerland, United Kingdom and Liechtenstein (see Annex XXXVI).

This means that EU operators importing or purchasing iron and steel products as listed in Annex XVII from Norway, Switzerland, United Kingdom and Liechtenstein are not required to provide evidence of the country of origin of the iron and steel inputs used in a third country for the processing of the iron and steel products imported in the Union.