

Import ban on iron steel products from Russia (833/2014)

Background / Objective / Affected parties

- Affected parties: Companies that import certain iron and steel products into the EU.
- Objective: Russia's actions against Ukraine are to be sanctioned by an import ban on certain iron and steel products.
- Background: The EU sanctions against Russia introduced on 31.07.2014 (Regulation 833/2014) were expanded with the 11th sanctions package in 2023 to include a newly inserted Article 3g of the Regulation and Annex XVII.

Regulatory content

- The import ban only applies to the products listed in Annex XVII. Transport containers made of iron or steel that are used exclusively for transportation purposes are not covered by the import ban.
- Affected companies must first check whether the products they are importing into the EU correspond to the products listed in Annex XVII (CN codes).
- In the case of Annex XVII products from third countries, proof of the countries of origin of the products is required at the time of import. The obligation to provide proof only applies to the final processing stage. In other words, not for the entire supply chain.
- No proof is required for Switzerland and Norway. This was clarified by the 12th Sanctions Package (Art. 3 g and Annex XXXVI).
- Mill test certificates or invoices, delivery bills, quality certificates and customs export documents from the exporting country that show the non-Russian origin of the primary products can be used as evidence.
- The obligation to provide proof only applies to imports into the EU, but not to purchases of products within the EU.

ECOMAL Statement

- ECOMAL does not import any products into the EU that correspond to the products listed in Annex XVII (CN codes). ECOMAL also does not sell such products.