

11th Sanctions package against Russia (Council Regulation (EU) No 833/2014) concerning imports for iron and steel

Since March 2014 (through Council Regulation (EU) No 833/2014 of 31 July 2014: current consolidated text: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014R0833-20231001>) the EU has progressively imposed restrictive measures (sanctions) against Russia, initially in response to the illegal annexation of Crimea and Sevastopol and the deliberate destabilisation of Ukraine.

On 23 February 2022, the EU expanded the sanctions in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk 'oblasts' of Ukraine, and the ordering of Russian armed forces into those areas. After 24 February 2022, in response to Russia's military aggression against Ukraine, the EU massively expanded the sanctions.

On June 21, 2023, EU member states agreed on the eleventh package of sanctions against Russia over its invasion of Ukraine. The sanctions package was published in the Official Journal of the EU on June 23, 2023 - Council Regulation (EU) 2023/1214 of 23 June 2023 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32023R1214> .

Beside others the sanctions tighten restrictions on imports of iron and steel goods by requiring importers of sanctioned iron and steel goods that have been processed in a third country to prove that the inputs used do not come from Russia.

There is now an obligation on importers to provide proof that the iron and steel products imported to the EU from third countries do not incorporate banned steel inputs from Russia.

Article 3g

It shall be prohibited:

(a) to import, directly or indirectly, iron and steel products as listed in Annex XVII into the Union if they:

- (i) originate in Russia; or*
- (ii) have been exported from Russia;*

(b) to purchase, directly or indirectly, iron and steel products as listed in Annex XVII which are located or which originated in Russia;

(c) to transport iron and steel products as listed in Annex XVII if they originated in Russia or are being exported from Russia to any other country;

(d) to import or purchase, as from 30 September 2023, directly or indirectly, iron and steel products as listed in Annex XVII when processed in a third country incorporating iron and steel products originating in Russia as listed in Annex XVII; with regard to products listed in Annex XVII processed in a third country incorporating steel products originating in Russia of CN codes 7207 11 , 7207 12 10 or 7224 90 , this prohibition shall apply as of 1 April 2024 for CN code 7207 11 and as of 1 October 2024 for CN codes 7207 12 10 and 7224 90;

For the purposes of the application of this point, at the moment of importation, importers shall provide evidence of the country of origin of the iron and steel inputs used for the processing of the product in a third country.