Dear Customers,

On June 23rd, 2023, the EU implemented its 11th package of sanctions against Russia. These measures aimed to enforce existing EU sanctions, including expanded restrictions on the sale, export, and transit of specific goods and technology. The sanctions also included additional measures to prevent circumvention and a ban on importing iron and steel products of Russian origin.

Article 3g of Regulation (EU) No 833/2014 now includes restrictions specifically on imports into the EU of iron and steel products processed in third countries, incorporating Russian iron and steel products in any quantity under Annex XVII. EU importers must now procure and furnish evidence to the customs authorities of the member states regarding the origin of the iron and steel products used in the manufacturing process.

As per the current regulation, all importers of iron and steel products must:

1. Review their import data to identify products classified under any of the commodity codes listed in Annex XVII to Regulation (EU) No 833/2014, regardless of their non-preferential origin.

2. Review the customs classification of the targeted items. Importers should collect all necessary documentation and evidence to be presented to customs authorities during the import process.

Evidence of Compliance - Mill Test Certificate (MTC)
As clarified by the European Commission, the required evidence for submission by the Importer may be the “Mill Test Certificate” (MTC) and/or another applicable evidence as defined by local customs authorities. The MTC is created by the manufacturer to document the chemical and physical properties of the products.

The customs authorities may require additional information or evidence about the process, such as supplementary separate mill test certificates for the different transformation steps which the product has undergone.

DHL Process and Requirements
For customs clearance provided by DHL, it is the customers’ responsibility to provide DHL with all the necessary documents and information, which must be accurate and complete, to comply with the regulatory requirements. Complying with the new requirements is important to avoid demurrage and other costs caused by delays caused during customs clearance (e.g. due to missing documentation). DHL might require the customer to sign a declaration of compliance and/or indemnification letter.
If not already contacted, your DHL representative will contact you regarding to requirements.

For more information, please access below:

- The 11th package of sanctions against Russia published in the [Official Journal of the EU](https://eur-lex.europa.eu/
- Learn more about compliance evidence and the Mill Test Certificate in the [EU Sanctions FAQ](https://

Disclaimer

While we have made every attempt to ensure that the information contained herein has been obtained, produced, and processed from sources believed to be reliable, no warranty, express or implied, is made regarding the accuracy, adequacy, completeness, legality, reliability, or usefulness of such information. All information contained herein is provided on an "as is" basis.

In no event will DHL Global Forwarding, its related partnerships or corporations under the DHL Group, or the partners, agents or employees thereof be liable to you or anyone else for any decision made or action taken in reliance on the information contained herein or for any consequential, special, or similar damages, even if advised of the possibility of such damages.

Sincerely,
DHL Global Forwarding