

L'impianto controsanzionatorio della Russia: impatto sulle aziende italiane

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THE MAIN THREAT CAN BE GROUPED IN FOUR MAIN TOPIC:

COUNTRIES

COMMODITY

TRANSPORT
MODE

ROUTING

Countries: General Information

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Temporary ban on the export from the Russian Federation applies to the following countries:

Australia	Albania	Andorra	United Kingdom	Member States of the European Union	Iceland
Canada	Liechtenstein	Micronesia	Monaco	New Zealand	Norway
Republic of Korea	San Marino	North Macedonia	Singapore	United States	United States of America
Taiwan (People's Republic of China)	Ukraine	Montenegro	Switzerland	Japan	

Commodity: General Information

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Considering the fast changing regulatory scenario, we advise you to visit the Italy-Russia Chamber of Commerce website: at this [link](#) you find the list of the latest Decree issued by Russian President on commodities banned for export from Russia to EU.

For further information you can always rely on your broker, custom consultant, freight forwarder.

Be sure to check if the commodity can be BOTH exported from Russia as well as imported in the EU.

Transport mode and routes. General Information

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Road freight

- 1) This transport mode can be affected from delays : long queue at the borders for trucks due to severe custom checks
- 2) Lack of drivers and trailers covering this route
- 3) Limitation for Belorussian and Russian Carriers to enter EU
- 4) Extreme volatility on prices
- 5) Insurance issues (in the nearest future insurance company can refuse to cover the cargo)
- 6) Geopolitical tension on the border



Air freight

After the closure of the airspace for Russian airlines by the states of Europe and Canada, Russia introduced an indefinite restriction on the operation of flights by air carriers of 36 states in the airspace of the Russian Federation.

This led to a reduction in the aircraft hold to and from the Russian Federation, with a relative increase in air freight rates.

Only services with a stopover in non-sanctioned countries are allowed to enter and exit.



Ocean freight

CMA CGM, MAERSK, MSC, ONE decided not to take any Russian booking to and from Russia with exception of essential goods such as food, medical equipment and humanitarian goods (beside the restricted one).

In this regard, the goods are partly redirected to the ports of the Middle and Far East (second leg via rail)

RUSSIA-UCRAINA CONFLICT

The conflict between Russia and Ukraine has had a heavy impact on commercial traffic to

- Russia
- Ukraine
- Belarus

Companies pursuing international trade with these countries should be aware of the sanctioning framework which, in constant evolution, has entailed important limitations in relations between economic operators.

Preventive controls

- Check the freight commodity is not included in restrictions or sanctions
- Check that subjects or entities are subject to restrictions or sanctions
- Financial and legal compliance

SANCTIONS TYPE

OBJECTIVE

- Technical features of the products
- Check on the list of sanctioned or restricted commodity

SUBJECTIVE

Check of the subjects involved in the trade, both physical person or legal entity

SANCTIONED COMMODITY:

Regulation (UE) n. 833/2014 and integration

EXPORT

- DUAL USE COMMODITY

They are products that, although born and sold for civilian use, could also be used for military purposes. Both components and finished products are included..

- ALMOST DUAL USE COMMODITY

- LUXURY GOODS :unit value> 300 Euro, unless otherwise specified in Annex XVIII (The value to be considered includes transport / insurance)

- INDUSTRY CLASSIFICATIONS:

- A) AVIATION AND SPACE INDUSTRY
- B) OIL REFINING
- C) OIL & GAS
- D) NAVAL INDUSTRY

IMPORT

- STEEL GOODS

SOURCES

Below the main link to provide guidance on current regulation:

- Gazzetta Ufficiale UE: <https://eur-lex.europa.eu/oj/direct-access.html?locale=it>
- ADM <https://www.adm.gov.it/portale/speciale-crisi-russia-ucraina>
- Commissione Europea https://ec.europa.eu/info/index_it
- TARIC <https://aidaonline7.adm.gov.it/nsitaricinternet/TaricServlet>
home> consultazione >nomenclature taric – visualizza

es. 62014090: Destinazione: RUSSIA

home>consultazione>nomenclature taric - indice taric>nomenclature taric - visualizza>misure - esportazione

Elenco Misure Taric Esportazione al 14/03/2022		
Nomenclatura	Taric	Descrizione
62014090	00	di un peso, per pezzo, superiore a 1 kg (A148)
Esportazione		
Unità supplementare (ERGA OMNES): p/st		Regolamento: 1R.2658/87
Restrizioni		
Autorizzazione all'esportazione (Dual use) (ALLTC): Condizioni		Regolamento: 4R.0001/22 Note: CD464 DU029
Dichiarazione della sottovoce soggetta a restrizioni (peso netto/unita' supplementare) (ERGA OMNES): Condizione		Regolamento: 1R.0927/12 Note: CD651
Controllo all'esportazione delle merci e delle tecnologie sottoposte a restrizioni (RU): Condizioni		Regolamento: 1D.0512/14 Note: CD994 TM679
Controllo all'esportazione sulla Pelle da pellicceria di Cane e Gatto (ALLTC): Certificato		Regolamento: 1R.1523/07 Note: CD568
Controllo all'esportazione (RU): Condizioni		Regolamento: 4R.0328/22 Note: TM856

Chiudi Indietro

In questo caso va verificato con i regolamenti citati, che i beni non rientrino in quelli duali, per i quali necessiterebbe un'apposita autorizzazione.



Consultancy and custom issues

About all further issues, regarding a deeper analysis of the commodities to be exported from Russia (imported in EU), we can still:

- Coordinate and verify existing regulations, supporting with consult and custom services locally, together with our affordable local licensed custom brokers
- Coordinate and verify existing regulations, supporting with consult and custom services in Italy, together with our colleagues part of DB Group, Bessegato Srl (customs.consultancy@bessegato.it), licensed custom broker

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