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Notice

Guidance on third country processed iron and steel measures

Updated 8 September 2023

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This publication is available at <https://www.gov.uk/government/publications/notice-to-importers-2953-russia-import-sanctions/guidance-on-third-country-processed-iron-and-steel-measures>

This section explains the scope of the measures related to relevant Russian iron and steel processed in third countries only, and the evidence traders need to provide to demonstrate compliance. It does not discuss other prohibitions (including other measures related to Russian iron and steel). See the [statutory guidance on Russia sanctions \(https://www.gov.uk/government/publications/russia-sanctions-guidance/russia-sanctions-guidance\)](https://www.gov.uk/government/publications/russia-sanctions-guidance/russia-sanctions-guidance) for this.

In response to Russia's invasion of Ukraine, the UK government has imposed a range of sanction measures, including trade, financial, transport and other sanctions, under [The Russia \(Sanctions\) \(EU Exit\) Regulations 2019 \(https://www.legislation.gov.uk/uksi/2019/855/contents\)](https://www.legislation.gov.uk/uksi/2019/855/contents) ("the Russia Regulations"). The sanctions are aimed at encouraging Russia to cease actions which destabilise Ukraine, or undermine or threaten the territorial integrity, sovereignty, or independence of Ukraine.

The [Russia \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2023 \(https://www.legislation.gov.uk/uksi/2023/440/contents/made\)](https://www.legislation.gov.uk/uksi/2023/440/contents/made) ("the 2023 Regulations") amended the Russia Regulations and along with several other measures, introduced a prohibition on the import of certain Russian iron and steel products processed in a third country or multiple third countries. This built on measures banning the import of Russian origin iron and steel introduced in 2022. The ban on third country processed iron and steel is set out in [Regulation 46IA and 46IB \(https://www.legislation.gov.uk/uksi/2023/440/regulation/3/made\)](https://www.legislation.gov.uk/uksi/2023/440/regulation/3/made), which can be found in Chapter 4CA of Part 5 of the 2023 Regulations. Third country processing can be a means of concealing the Russian origin of iron and steel products, and this measure is targeted at reducing circumvention of sanctions on Russian iron and steel.

The prohibition on the import of Russian iron and steel products processed in a third country will come into effect from 30 September 2023. As the measure was introduced in the 2023 Regulations in April, there will be no exceptions or transitional period for any goods covered by the measure.

Explanation of Regulations

For the purpose of this sanction, a relevant 'iron and steel product' is defined as anything specified in [Schedule 3B of the Russia Sanctions Regulations \(https://www.legislation.gov.uk/uksi/2019/855/schedule/3B\)](https://www.legislation.gov.uk/uksi/2019/855/schedule/3B). The HS codes for the relevant products are also set out at the end of this guidance.

The regulations prohibit the import into the UK of an iron and steel product, when it meets all the following criteria:

- is listed in Schedule 3B of the Russia Sanctions Regulations

- has been “altered, transformed in any way; or subjected to any type of operation or process” in a third country (see [Regulation 46IA \(https://www.legislation.gov.uk/ukxi/2023/440/regulation/3/made\)](https://www.legislation.gov.uk/ukxi/2023/440/regulation/3/made))
- incorporates one or more Schedule 3B iron and steel product/products of Russian origin

The following scenarios provide examples of how these rules may be applied in practice (where Country X and Country Y are countries that are not the UK, the Isle of Man, or Russia):

Scenario 1

A product of Russian origin that is a good listed in Schedule 3B when it leaves Russia is then processed in a third country into another good listed in Schedule 3B. Importing this product into the UK is prohibited.

For example, steel slabs (HS 7207) of Russian origin are exported from Russia and enter Country X. Here, they are transformed into hot rolled coils of alloy steel (HS 7225 - 7226) and are of Country X’s origin before being imported into the UK.

The import in this example would be prohibited.

Scenario 2

A product of Russian origin that is a good listed in Schedule 3B when it leaves Russia then undergoes multiple stages of processing in one or more third countries, such that it loses its Russian origin before it is incorporated in the final transformation step, but remains a Schedule 3B good. Importing the final Schedule 3B product into the UK is prohibited because it contains a Schedule 3B good that has been of Russian origin at some point during its lifespan.

For example, steel billets (HS 7207) of Russian origin are exported from Russia and enter Country X. Here, they are transformed into steel rods (HS 7215), such that they are now of Country X origin. These enter Country Y, where they undergo processing into steel wire (HS 7223), before being imported into the UK.

The import in this example would be prohibited.

Scenario 3

A product of Russian origin that is not a good listed in Schedule 3B when it leaves Russia is then processed in a third country, such that it becomes a good listed in Schedule 3B. Importing this to the UK is not prohibited under the Russia Regulations, because the product now entering the UK has incorporated non-Schedule 3B items.

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

The import in this example would not be prohibited under the Russia Regulations.

Scenario 4

A product of Russian origin that is a good listed in Schedule 3B when it leaves Russia is then processed in a third country into an entirely different product (a good not listed in Schedule 3B). Importing this into the UK is not prohibited under the Russia Regulations.

For example, coils of stainless steel (HS 7219 – 7220) of Russian origin are exported from Russia and enter country X. Here, they are used to manufacture a car (HS 8703), which is now considered to be of country X origin and is imported into the UK.

The import in this example would not be prohibited under the Russia Regulations.

Guidance on Demonstrating Compliance

Demonstrating supply chain history

Traders should be prepared to have documentation available to demonstrate evidence of a good's supply chain, which must be consistent with the prohibitions under the regulations.

Evidence requested to be provided through documentation could include:

- the country of origin of the iron and steel products processed in the third country (or third countries) after the fact
- the date that the iron and steel product left its country of origin
- the country(s) and facility(s) where processing has taken place

An example of evidence may include, but is not limited to, a Mill Test Certificate (MTC), or Mill Test Certificates (MTCs) where the relevant information cannot be summarised in a single document.

Licensing Provisions

Traders seeking to import banned iron and steel processed in the third country into the UK after the 30 September 2023 can apply for a licence. The Secretary of State for Business and Trade is ultimately responsible for decisions to grant or refuse a trade sanctions licence in any individual case. There are some specific activities that DBT considers are likely to be consistent with the aims of the sanctions, and thus may be eligible for a licence. These are set out in the statutory guidance on Russia sanctions

(<https://www.gov.uk/government/publications/russia-sanctions-guidance/russia-sanctions-guidance>) and may include the import of iron and steel that left Russia before 21 April 2023.

HMRC Inspection

Traders may be requested to present evidence of a good's supply chain at the border. In some cases, customs may require further information relating to the goods to be produced. This could include, but is not limited to any invoice, bill of lading or other book or document whatsoever relating to the goods.

HMRC are also responsible for enforcing the licensing requirements and investigating suspected offences.

We advise all parts of the supply chain for third country processed iron and steel imports to the UK to undertake the necessary due diligence to ensure that sanctions are not being circumvented directly or indirectly. Not complying with the sanctions could constitute one of a number of criminal offences. See the statutory guidance on Russia sanctions

(<https://www.gov.uk/government/publications/russia-sanctions-guidance/russia-sanctions-guidance>) for more information on penalties.

Importers are also advised to include assurances that imports are not of Russian origin in contractual agreements.

Please note that these measures will be kept under review. This page will be updated accordingly to notify of any future amendments, if required.

HS codes in scope for the UK's import ban on Russian iron and steel processed in a third country

Please refer to Chapter 72 and 73 of the [UK Integrated Online Tariff checker \(https://www.trade-tariff.service.gov.uk/find_commodity\)](https://www.trade-tariff.service.gov.uk/find_commodity) for more information on HS codes listed below.

HS code	Description
7206	Iron and non-alloy steel in ingots or other primary forms (excluding iron of heading 7203)
7207	Semi-finished products of iron or non-alloy steel
7208	Non Alloy and Other Alloy Hot Rolled Sheets and Strips; Non Alloy and Other Alloy Quarto Plates; Rolled on four faces or in a closed box pass, of a width not exceeding 1250 mm; Rolled on four faces or in a closed box pass, of a width exceeding 1250 mm and of a thickness of 4 mm or more
7209	Tin Mill products; Non Alloy and Other Alloy Cold Rolled Sheets; Electrical Sheets (other than GOES)
7210	Metallic Coated Sheets; Organic Coated Sheets; Tin Mill products; Non Alloy and Other Alloy Quarto Plates
7211	Non Alloy and Other Alloy Hot Rolled Sheets and Strips; Non Alloy and Other Alloy Cold Rolled Sheets; Rolled on four faces or in a closed box pass, of a width exceeding 150 mm and a thickness of not less than 4 mm, not in coils and without patterns in relief
7212	Non Alloy and Other Alloy Hot Rolled Sheets and Strips; Metallic Coated Sheets; Organic Coated Sheets; Tin Mill Products;

HS code	Description
7213	Non Alloy and Other Alloy Wire Rod
7214	Non Alloy and Other Alloy Merchant Bars and Light Sections; Rebars; Other bars and rods of iron or non-alloy steel, not further worked than forged, hot-rolled, hot-drawn or hot-extruded, but including those twisted after rolling
7215	Non Alloy and Other Alloy Merchant Bars and Light Sections; Non-alloy and other alloy cold finished bars
7216	Non Alloy and Other Alloy Merchant Bars and Light Sections; Angles, shapes and sections, not further worked than cold-formed or cold-finished
7217	Non Alloy Wire
7218	Stainless steel in ingots or other primary forms; semi-finished products of stainless steel
7219	Stainless Hot Rolled Sheets and Strips
7220	Stainless Hot Rolled Sheets and Strips
7221	Stainless Wire Rod
7222	Stainless Bars and Light Sections
7223	Wire of stainless steel, in coils (excluding Bars and rods)
7224	Steel, alloy, other than stainless, in ingots or other primary forms, semi-finished products of alloy steel other than stainless
7225	Non Alloy and Other Alloy Hot Rolled Sheets and Strips; Non Alloy and Other Alloy Cold Rolled Sheets; Electrical Sheets (other than GOES); Metallic Coated Sheets; Non Alloy and Other Alloy Quarto Plates; Flat-rolled products of other alloy steel, of a width of 600 mm or more
7226	Non Alloy and Other Alloy Hot Rolled Sheets and Strips; Non Alloy and Other Alloy Cold Rolled Sheets; Electrical Sheets (other than GOES); Metallic Coated Sheets; Flat-rolled products of other alloy steel, of a width of less than 600 mm
7227	Non Alloy and Other Alloy Wire Rod

HS code	Description
7228	Non Alloy and Other Alloy Merchant Bars and Light Sections; Non-alloy and other alloy cold finished bars
7229	Other bars and rods of other alloy steel; angles, shapes and sections, of other alloy steel; hollow drill bars and rods, of alloy or non-alloy steel; Other bars and rods of other alloy steel; angles, shapes and sections, of other alloy steel; hollow drill bars and rods, of alloy or non-alloy steel
7301	Angles, shapes and sections; Sheet Piling
7302	Railway Material
7303	Tubes, pipes and hollow profiles, of cast iron
7304	Seamless Stainless Tubes and Pipes; Other Seamless Tubes
7305	Large welded tubes
7306	Other Welded Pipes
7307	Tube or pipe fittings excluding "couplings, elbows, sleeves", of iron or steel
7308	Structures and parts of structures e.g. "bridges and bridge-sections, lock-gates, towers, lattice masts, roofs, roofing frameworks, doors and windows and their frames and thresholds for doors, shutters, balustrades, pillars and columns", of iron or steel; plates, rods, angles, shapes, sections, tubes and the like, prepared for use in structures, of iron or steel (excluding Prefabricated buildings of heading 9406)
7309	Reservoirs, tanks, vats and similar containers, of iron or steel, for any material "other than compressed or liquefied gas", of a capacity of > 300 l, not fitted with mechanical or thermal equipment, whether or not lined or heat-insulated (excluding Containers specifically constructed or equipped for one or more types of transport)
7310	Tanks, casks, drums, cans, boxes and similar containers, of iron or steel, for any material "other than compressed or liquefied gas", of a capacity of ≤ 300 l, not fitted with mechanical or thermal equipment, whether or not lined or heat-insulated, n.e.s.
7311	Containers of iron or steel, for compressed or liquefied gas (excluding Containers specifically constructed or equipped for one or more types of transport)

HS code	Description
7312	Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel (excluding Electrically insulated products and twisted fencing wire and barbed wire)
7313	Barbed wire of iron or steel; twisted hoop or single flat wire, barbed or not, and loosely twisted double wire, of a kind used for fencing, of iron or steel
7314	Cloth, incl. Endless bands, grill, netting and fencing, of iron or steel wire, expanded metal of iron or steel (excluding Woven products of metal fibres of a kind used for cladding, lining or similar purposes)
7315	Chain and parts thereof, of iron or steel (excluding Watch chains, necklace chains and the like, cutting and saw chain, skid chain, scraper chain for conveyors, toothed chain for textile machinery and the like, safety devices with chains for securing doors, measuring chains)
7316	Anchors, grapnels and parts thereof, of iron or steel
7317	Nails, tacks, drawing pins, corrugated nails, staples and similar articles of iron or steel, whether or not with heads of other material (excluding Such articles with heads of copper and staples in strips)
7318	Screws, bolts, nuts, coach screws, screw hooks, rivets, cotters, cotter pins, washers, incl. Spring washers, and similar articles, of iron or steel (excluding Lag screws, stoppers, plugs and the like, threaded)
7319	Sewing needles, knitting needles, bodkins, crochet hooks, embroidery stiletos and similar articles, for use in the hand, of iron or steel; safety pins and other pins of iron or steel, n.e.s.
7320	Springs and leaves for springs, of iron or steel
7321	Stoves, ranges, grates, cookers, incl. Those with subsidiary boilers for central heating, barbecues, braziers, gas rings, plate warmers and similar non-electric domestic appliances, and parts thereof of iron or steel (excluding Boilers and radiators for central heating, geysers and hot water cylinders)
7322	Radiators for central heating, not-electrically heated, and parts thereof, of iron or steel; air heaters and hot-air distributors (incl. Distributors which can also distribute fresh or conditioned air), not-electrically heated, incorporating a motor-driven fan or blower, and parts thereof, of iron or steel

HS code	Description
7323	Table, kitchen or other household articles, and parts thereof, of iron or steel; iron or steel wool; pot scourers and scouring or polishing pads, gloves and the like, of iron or steel (excluding Cans, boxes and similar containers of heading 7310; waste baskets; shovels, corkscrews and other articles of the nature of a work implement; articles of cutlery, spoons, ladles, forks etc. Of heading 8211 to 8215; ornamental articles; sanitary ware)
7324	Sanitary ware, and parts thereof, of iron or steel (excluding Cans, boxes and similar containers of heading 7310, small wall cabinets for medical supplies or toiletries and other furniture of chapter 94, and fittings)
7325	Articles of iron or steel, cast, n.e.s.
7326	Articles of iron or steel, n.e.s. (excluding Cast articles)

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