

Compliance with and Evidence requirements to avoid blocked deliveries at EU customs – related to EU Regulation 833/2014

All products supplied by Clevedon Fasteners Ltd/Clevtec fully comply with **COUNCIL REGULATION (EU) 2023/1214 ANNEX XVII** No material/process involved in the manufacture of our parts were sourced from Russia or Belarus. MTC's available upon request

This statement appears on all Clevedon/Clevtec invoices / delivery notes / packing notes and sales orders

There is some confusion regarding what is actually required in terms of documentation in order to comply with this EU directive. We have written confirmation from our supply chain that no material, processes, chemicals or liquids used in the manufacture of our parts were or are sourced or include parts thereof from Russia or Belarus. In addition, MTC's for raw material are available upon request.

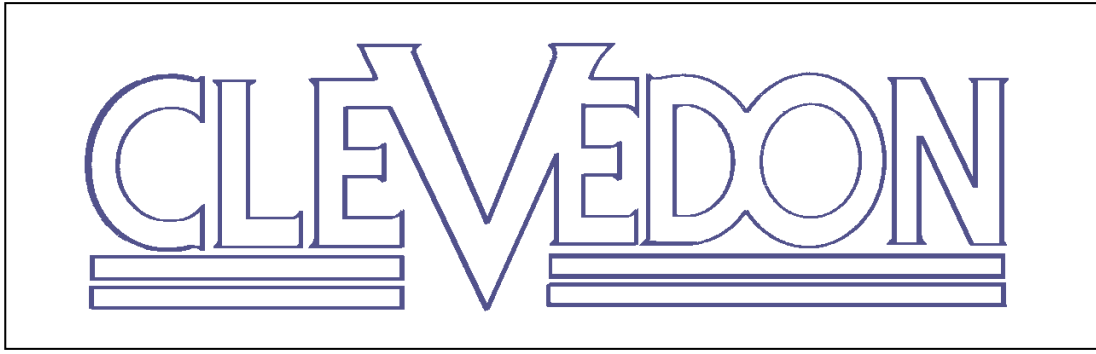
The latest communication dated 05/10/23 from the EU Council contained in their FAQ's contain two pertinent statements in an attempt to clarify questions that have been raised by EU member countries and trade bodies

The first relates to products sold from stock and where the applicable "cut off" point is

6. Does the application of Article 3g (1) (d) of Regulation (EU) No 833/2014 also extend to products that were manufactured or processed in a third country before 30 September 2023?

Last update: 2 October 2023

The prohibition applies to imports of iron and steel products incorporating inputs originating from Russia that enter the Union as of 30 September 2023, **provided that they were manufactured or produced after 23 June 2023.** That is the date when the obligation for the importer to demonstrate the country of origin of the iron and steel inputs used for the processing of the product in a third country was introduced in EU law. Coupled with the almost one-year wind-down period of the prohibition itself, this should have allowed an orderly planning of imports into the Union of the relevant goods before 30 September 2023.



If the abovementioned goods are already in the territory of the Union and have been presented to customs before 30 September 2023, Article 12e applies and they can be purchased or transferred after that date (see Q3).

The second refers to the documentation needed to evidence compliance

9. Is the mill test certificate (MTC) the only document that is accepted as evidence that the goods to be imported in the Union do not incorporate iron and steel inputs as listed in Annex XVII originating in Russia?

Last update: 2 October 2023

No. The MTC is an example that can be regarded as sufficient evidence. However, it is for the relevant national competent authorities to establish which other documentation can be considered as evidence of the country of origin of the iron and steel inputs used in a third country for the processing of the iron and steel products imported in the Union.

The origin of the inputs may be established through other means, such as a statement or declaration by the exporter or manufacturer confirming that, after exercising due diligence, the imported product does not contain any Russian steel or iron. Other documents may be invoices, delivery notes, supplier's declarations, including supplier's declarations covering several consignments (long term supplier's declarations) business correspondence, production descriptions, quality certificates and clauses in implemented purchase orders or contracts, provided that they include information of the origin of goods, etc. The type of document(s) may also vary depending on the nature of the product, in particular for finished products (e.g. sewing needles, tubes, etc.).

National competent authorities should assess evidence in a proportionate and reasonable manner, and exercise due care to avoid a breach or circumvention.

In view of ensuring uniform implementation, the Commission will closely monitor national implementation practices.

Cleveton/Clevtec are fully compliant and meet these requirements

Steve Hardeman
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