

ダイヤモンドの輸入規制等について

2026年1月中に導入予定となっております、G7のダイヤモンドのトレーサビリティシステムにつきまして、EUのFAQが下記URLの通り改訂され、当面の間導入されない見込みとなっております。

【ご参考】 https://finance.ec.europa.eu/publications/restrictions-diamonds_en
(次ページ以降 2～16 ページ)

一方で、EUの措置（G7の措置ではなくあくまでEUの措置）として、EU域内へのロシア産ダイヤモンドの間接輸入を禁止する目的で、輸入時に「Due Diligence Statement」（宣誓書のような1枚紙）を提出するという措置が2026年1月1日より導入されております。

また、この際、ロシア産のダイヤモンドではないことを証明するインボイス等の提出は不要ではございますが、提出を求められた際に提出ができるよう、保管をしておく必要がございます。本措置は、EUへダイヤモンドを輸出する日本企業の皆様も他国の企業と同様に対象となり得るものです。

本措置につきましては下記のHPをご確認いただきますようお願いいたします。

なお、EUの措置でございますので、経済産業省へお問い合わせいただきましてもご回答できかねますので、ご了承ください。

【ご参考】 <https://www.awdc.be/traceability-update-january-1-2026>

RESTRICTIONS ON DIAMONDS

RELATED ARTICLE: ARTICLE 3p OF COUNCIL REGULATION NO. 833/2014
FREQUENTLY ASKED QUESTIONS – AS OF 17 DECEMBER 2025

1. What is the diamond import ban?

Last update: 17 December 2025

On 6 December 2023, building on the statements of February and May 2023, the Leaders of the Group of Seven (G7) agreed to introduce import restrictions on non-industrial diamonds, mined, processed, or produced in Russia, by 1 January 2024, followed by further phased restrictions on the import of Russian diamonds processed in third countries targeting 1 March 2024.

The EU sanctions on Russian diamonds were introduced in Article 3p of Council Regulation No. 833/2014 through Council Regulation (EU) 2023/2878 of 18 December 2023 (the 12th sanctions package), and subsequently amended by Council Regulation (EU) 2024/1745 of 24 June 2024 (the 14th sanctions package) and Council Regulation (EU) 2025/395 of 24 February 2025 (the 16th sanctions package) (see Questions 16 and 22, respectively). They are part of the concerted G7 effort to introduce an internationally coordinated diamond ban, that aims at depriving Russia of this important revenue stream estimated at EUR 4 billion per year, of which approximately EUR 1.5 billion are annual imports into the EU.

A ban is only effective if a major part of the world's diamond retail market implements such a ban. To this end, the Commission has been engaging with G7 countries and other key partners, including industry, with the aim of designing and ensuring the effective implementation of coordinated restrictive measures, including through tracing technologies.

2. What are the different stages of the diamond ban?

Last update: 17 December 2025

Article 3p of Council Regulation No. 833/2014 prohibits the purchase, import, or transfer of Russian non-industrial diamonds in several stages:

- Since 1 January 2024, diamonds (natural and synthetic) and products incorporating diamonds (jewellery) listed in Parts A, B and C of Annex XXXVIII A of Council Regulation No. 833/2014 are banned if they originate in Russia or have been exported from Russia. The same applies to such goods (of any origin) if they transited through Russia;
- Since 1 March 2024, the prohibition applies also to Russian natural diamonds as listed in Part A of Annex XXXVIII A that have been processed in a third country, consisting of Russian diamonds equal to or above 1.0 carats per diamond;

- In June 2024 a “grandfathering” clause was added for stocks of diamonds held in the EU or in third countries (but outside Russia) prior to the respective stage of the ban;
- Since 1 September 2024, the prohibition applies also to Russian natural and synthetic diamonds (all products listed in Parts A and B of Annex XXXVIII A) that have been processed in a third country, consisting of or incorporating diamonds originating in Russia or exported from Russia with a weight equal to or above 0.5 carats or 0.1 grams* per diamond.
- Since 1 March 2025, it is mandatory to submit for verification the Kimberly Process (KP) certificate pursuant to Council Regulation (EC) No 2368/2002 clearly indicating the countries of mining origin of all diamonds in the shipment, when importing rough diamonds of mixed origin into the EU.
- As from 1 January 2026, imports of polished diamonds need to be accompanied by traceability evidence (see Questions 8 and 9).

The entry into force of the prohibition on jewellery (all products listed in Part C of Annex XXXVIII A) incorporating Russian diamonds processed in third countries (other than Russia), initially planned for 1 September 2024, has been postponed. On 24 June 2024, the Council adopted Council Regulation (EU) 2024/1745 (the 14th sanctions package) postponing the application of this measure (Article 3p, new paragraph 4). The date of entry into force of such a ban has not been set yet, as it depends on what the Council decides in view of action taken within the G7 to pursue that measure.

* Synthetic diamonds are measured in grams in the Combined Nomenclature (1 carat = 0.2 grams)

3. Do the thresholds of 1.0 carats and 0.5 carats refer to the weight of the diamond before it is polished, or after?

Last update: 22 December 2023

The weight thresholds apply equally to rough and polished diamonds at the time of importation into the Union.

4. Is diamond jewellery incorporating Russian diamonds banned?

Last update: 20 December 2024

It depends on the origin of the jewellery or whether it has been exported or transited Russia.

As of 1 January 2024, it is prohibited to purchase, import, or transfer jewellery incorporating Russian diamonds as listed in Part C of Annex XXXVIII A of Council Regulation No. 833/2014 if it originates in Russia or has been exported from Russia (Article 3p, paragraph 1). The same applies to jewellery incorporating diamonds of any origin that transited through Russia (Article 3p, paragraph 2).

A ban on jewellery that has been processed in a third country, incorporating diamonds originating in Russia or exported from Russia with a weight equal to or above 0.5 carats or 0.1 grams per diamond, was supposed to enter into force as of 1 September 2024. On 24 June 2024 the Council adopted Council Regulation (EU) 2024/1745 (part of the 14th sanctions package) and postponed the entry into force of this measure. The date of entry into force of such a ban has not been set yet, as it depends on what the Council decides in view of action taken within the G7 to pursue that measure. A new Regulation determining the date of the entry into force of such a ban will have to be adopted by the Council (Article 3p, new paragraph 4).

Furthermore, there is a ban on gold jewellery (Article 3o) and precious metal jewellery (Article 3i) from Russia.

5. Can I travel with diamond jewellery to and from Russia?

Last update: 22 December 2023

Yes, the prohibition of Article 3p does not apply to jewellery incorporating Russian diamonds for personal use of natural persons travelling to the European Union or of their immediate family members travelling with them, as long as it is owned by those individuals and not intended for sale.

A similar exemption also applies to the gold ban of Article 3o and to the ban on exports of diamond jewellery included in the luxury goods list in Annex XVIII of Council Regulation No. 833/2014 (Article 3h).

6. Does the prohibition of Article 3p also apply to restricted goods that are already within the territory of the Union before entry into force of the relevant restrictive measures?

Last update: 17 December 2025

As for all other restrictive measures prohibiting the import, transfer or purchase, (see in this regard Q.3 of the FAQs on IMPORT, PURCHASE & TRANSFER OF LISTED GOODS) the restriction envisaged in Article 3p of Council Regulation No. 833/2014 does not concern goods which are already released for free circulation within the territory of the Union (i.e. usually already placed on the market) at the time when the respective measure enters into force. For goods already in the Union but not yet released for free circulation, the provisions of Article 12e of Council Regulation No. 833/2014 apply.

For diamonds that are exported and wish to re-enter the EU, please refer also to Questions 14 on documentation and 17 on grandfathering.

7. What sanctions other than Article 3p affect diamonds in Council Regulation No. 833/2014?

Last update: 22 December 2023

The EU already added the imports of synthetic diamonds from Russia to the import bans on 6 October 2022 (Article 3i of Council Regulation No. 833/2014).

In addition, there is a ban to import, transfer, and purchase gold jewellery as of 22 July 2022 (Article 3o) and precious metal jewellery (Article 3i) from Russia (added on 6 October 2022). To the extent diamonds are set in those products they are covered.

Diamonds and jewellery are subject to an export ban of luxury goods to Russia if the value is at least 300 EUR (Article 3h and Sections 10 and 18 of Annex XVIII). This includes for example synthetic/reconstructed diamonds, diamond dust and diamond jewellery, and some other luxury products, such as watches whether or not incorporating diamonds.

8. What is traceability evidence and certification for polished natural diamonds?

Last update: 17 December 2025

The traceability-based evidence and certification for polished diamonds in Part A of Annex XXXVIII falling under CN code 7102 39 00 was scheduled to be fully operational by 1 January 2026. However, a lack of coherence on the evidence requirements applied internationally requires an adjustment to be made to Article 3p.

In absence of an amendment of Article 3p before 1 January 2026, documentary-based evidence will continue to be accepted after 1 January 2026. Evidence derived from commercial traceability platforms is recommended. If such extracts are not available, other documentary-based evidence is also accepted if it proves that the mining origin of the polished diamond is not of Russian origin (see Question 14).

9. What is the timeline for the various stages related to the types of traceability evidence that are accepted?

Last update: 17 December 2025

Traceability evidence applies to diamonds of a carat weight above a certain threshold (0.5 carats or above). The stages are being gradually implemented in several steps:

- As of **1 March 2024**, optional G7 certification of rough natural diamonds based on documentary evidence proving the origin of the diamond(s) upon importation.
- As of **1 March 2025**, importation of rough natural diamonds with a weight of 0.5 carats or above is allowed if accompanied by a KP certificate that lists either a single country of mining origin or all countries of mining origin (in the case of parcels consisting of rough diamonds from more than one mining origin country), and is supported by additional documentary evidence. KP certificates that do not state countries of mining origin are not accepted unless they fall within the scope of the grandfathering exemption (see Question 17). Upon importation, rough diamonds are registered in a Registry storing the G7 certificates.
- As from **1 January 2026**, traceability evidence and certification for imports of polished diamonds, including diamonds polished in third countries, with a weight of 0.5 carats or above will become mandatory.

For further details on the traceability documentary evidence for importation of both rough and polished natural imports into the Union as from 1 January 2026), please see Questions 12 to 15 and 23 to 25.

10. Will G7 certificates still be needed after 1 January 2026?

Last update: 17 December 2025

Imports of rough diamonds, over 0.5 carat, that are not yet verified and have not been given a G7 certificate, will still need to be verified and issued a G7 certificate.

Imports of rough diamonds with a G7 certificate do not need to be re-verified by the Authority in Annex XXXVIII B.

Except for non-certified rough diamonds and polished diamonds to be imported into the EU, the G7 certificate is still optional. A G7 certificate facilitates the transfer between G7 members and are accepted in G7 members as evidence of non-Russian origin. Additional country-specific requirements may apply.

11. What do I need to know before I plan to import rough diamonds into the Union?

Last update: 17 December 2025

Importers shall provide evidence of the country of mining origin of the diamonds if the diamonds are above a certain carat weight as follows:

On 1 March 2024, all rough diamonds (CN codes 7102 31 00 and 7102 10 00) of 1.0 carats or above entering the EU market were required to pass through a so-called ‘rough import node’, located in Antwerp (Belgium) for initial verification (including physical check) and certification. Belgium already today handles 99.99% of the EU’s import of rough diamonds. Since 1 September 2024, the carat weight threshold was lowered to 0.5 carats or above.

The Authority for the verification of diamonds (listed in Annex XXXVIII B) is the following:

Federal Public Service Economy at the Diamond Office

Hoveniersstraat 22

B-2018 Antwerpen

Belgium

A G7 certificate identifying the diamond is issued in the rough node: this consists of a 35-digit number that is mentioned on the import declaration (‘G7 certificate’)

For imports into the Union as from 1 January 2026), please see Questions 14 and 17 below.

12. What is the link with Kimberley Process (KP) certification?

Last update: 17 December 2025

The sanctions on natural Russian diamonds apply to both rough and polished, diamonds with the exception of industrial diamonds. The system of implementation of the sanctions on diamonds will complement KP certification and verifications.

The control measures of the ban on Russian diamonds are gradually implemented in phases. Since 1 January 2024 the use of KP certificates is accepted as evidence of country of mining origin for imports of rough diamonds.

Since 1 March 2024, while a certification system issuing G7 certificates is in use, KP certificates are accepted as evidence of country of origin, if no Russian rough diamonds are mixed with other origins.

As of 1 March 2025, the KP certification requirements will continue to apply but only KP certificates in which the country of mining origin or the countries of mining origin are clearly stated are accepted (see Questions 14 and 22). This additional measure is part of EUs continuous efforts to enhance transparency within the Kimberley Process, marking an important step towards enhanced diamond provenance and traceability.

13. Where can I find the list of goods covered by the diamond ban of Article 3p?

Last update: 20 December 2024

The goods subject to the diamond ban are listed in Annex XXXVIII A of Council Regulation No. 833/2014:

Part A

	CN code	Description
	7102 10	Unsorted diamonds
	7102 31	Non-industrial diamonds, unworked or simply sawn, cleaved or bruted
	7102 39	Non-industrial diamonds, other than unworked or simply sawn, cleaved or bruted

Part B

	7104 21	Synthetic or reconstructed diamonds, unworked or simply sawn or roughly shaped
	7104 91	Synthetic or reconstructed diamonds, other than unworked or simply sawn or roughly shaped

Part C (currently only in force for imports into the EU coming directly from Russia or from third countries and of Russian origin)

Ex	7113	Articles of jewellery and parts thereof, of precious metal or of metal clad with precious metal, incorporating diamonds
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Ex	7114	Articles of goldsmiths' or silversmiths' wares and parts thereof, of precious metal or of metal clad with precious metal, incorporating diamonds
Ex	7115 90	Other articles of precious metal or of metal clad with precious metal, incorporating diamonds, not elsewhere specified, excluding platinum catalysts in the form of wire cloth or grill
Ex	7116 20	Articles of natural or cultured pearls, precious or semi-precious stones (natural, synthetic or reconstructed), incorporating diamonds
Ex	9101	Wristwatches, pocket-watches and other watches, including stopwatches, incorporating diamonds, with case of precious metal or of metal clad with precious metal

14. What requirements do I need to consider for importation as from 1 January 2026 of natural diamonds?

Last update: 17 December 2025

As from 1 January 2026, importers into the Union must comply with a traceability documentary evidence for importation of both rough and polished natural diamonds into EU customs territory. Rough natural diamonds of CN codes 7102 31 00 and 7102 10 00 with a weight equal to or above 0.5 carat (since 1 September 2024) need to be submitted without delay to the authority in Annex XXXVIII B (see Question 11).

To import rough or polished natural diamonds into the EU traceability documentary evidence is required to be prepared and available prior to, or at the time of importation.

The following cumulative information in addition to KP requirements, where applicable, must be available.

- **For rough diamonds:** Single country (parcel containing single country of mining origin) to be specified on KP Certificate; Multiple countries (parcels containing rough diamonds of different countries of mining origin) to be specified and listed in KP Certificates
- **For polished natural diamonds:** signed Due Dilligence Statement on Diamond Origin (DDS)
- **For both rough and polished diamonds:**
 - Invoice, pro-forma invoice or consignment note.
 - Names of buyer and seller.
 - CN codes and description.
 - Number of parcels in a shipment.
 - Weight in carat of the diamond(s).

--Value of the diamonds.

-- Place of importation, exportation, and route of transportation as applicable depending on the lifecycle of the diamond(s) prior to importation in the EU.

The type of documents containing the above information required for submission with entry may vary. But it is the importer’s responsibility to ensure the documentation meets all the above information requirements.

As an illustrative and non-exhaustive list, including the mandatory documents please consider the below examples of other documentation.

For rough natural diamonds	For polished natural diamonds
<ul style="list-style-type: none"> • KP certificates with single origin for diamonds at or above 0.5 carat (since 1 September 2024). • KP certificates with mixed origin in which the country of mining origin or the countries of mining origin are clearly stated, proving that no diamonds at or above 0.5 carat in the shipment are mined in Russia. 	<ul style="list-style-type: none"> • Signed Due Dilligence Statement on Diamond Origin confirming that none of the diamonds at or above 0.5 carat (since 1 September 2024) in the shipment are mined in Russia. For more information regarding the Due Dilligence Statement on Diamond Origin, please see Questions 23 -24.
<p>Additional documents proving the required information may include:</p>	<p>Evidence supporting the Due Diligence Statement on Diamond Origin should be available upon request of a National Competent Authority and may include:</p>
<ul style="list-style-type: none"> • Customs declaration form • Invoice • Packing list • Transport documentation, e.g. waybill document • Evidence from traceability systems 	<ul style="list-style-type: none"> • Customs declaration form • Invoice • Packing list • Transport documentation, e.g. waybill document • Laboratory grading report • Evidence from traceability systems

As of 1 March 2025, rough diamonds imported using mixed origin KP certificates receive a G7 certificate, provided that the country of mining origin or the countries of mining origin are clearly stated in the KP certificates.

15. What documentary evidence is necessary for the importation of rough or polished synthetic diamonds?

Last update: 04 August 2025

Direct imports from Russia of synthetic diamonds are banned since 1 January 2024. Since 1 September 2024 imports of rough and polished synthetic diamonds with a weight equal to or above 0.5 carat (0.1 gram) are also banned if the synthetic diamond is manufactured in Russia and the final processing (polishing etc.) has taken place in a third country.

To import rough or polished synthetic diamonds into the EU using documentary evidence, a set of minimum information is required to be prepared and available prior to, or at the time of importation.

For rough and polished synthetic diamonds, the following cumulative information is required to be available.

- Manufacturing country of origin or signed attestation or supplier declaration confirming that none of the diamonds at or above 0.5 carat (since 1 September 2024) in the shipment have been manufactured in Russia.
- Names of buyer and seller.
- CN codes and description.
- Weight in carat of the diamond(s) if at least one diamond (if multiple diamonds are shipped in a parcel) is of 0.5 carat (0.1 gram) or above (since of 1 September 2024).
- Value of the diamonds.
- Place of importation, exportation, and route of transportation as applicable depending on the lifecycle of the diamond(s) prior to importation in the EU.

The type of documents containing the above information required for submission with entry may vary. But it is the importer’s responsibility to ensure the documentation meets all the above information requirements. As an illustrative and non-exhaustive list, please consider the below examples of documentation.

For rough synthetic diamonds	For polished synthetic diamonds
<ul style="list-style-type: none"> • Signed attestation or supplier declaration confirming that none of the diamonds at or above 0.5 carat (0.1 gram) (since 1 September 2024) 	<ul style="list-style-type: none"> • Signed attestation or supplier declaration confirming that none of the diamonds at or above 0.5 carat (0.1 gram) (since 1 September 2024)

in the shipment are manufactured in Russia.	in the shipment are manufactured in Russia.
Additional documents proving the required information may include:	Evidence supporting the attestation or supplier declaration is mandatory and may include:
<ul style="list-style-type: none"> • Customs declaration form • Invoice • Packing list • Transport documentation, e.g. waybill document • Evidence from traceability systems 	<ul style="list-style-type: none"> • Customs declaration form • Invoice • Packing list • Transport documentation, e.g. waybill document • Laboratory grading report • Evidence from traceability systems

16. What changes did Council Regulation (EU) 2024/1745 (the 14th package of sanctions) adopted on 24 June 2024 introduce to the ban on Russian diamonds?
Last update: 17 December 2025

The following elements were added or modified through Council Regulation (EU) 2024/1745 of 24 June 2024 (the 14th package):

- a “grandfathering” clause for stocks of diamonds held in the EU or in third countries (but outside Russia): Council Regulation (EU) 2024/1745 clarifies that diamonds that were physically located in the EU or a third country (other than Russia), or were polished or manufactured there, before the import ban on Russian diamonds entered into force, are not subject to the ban (Article 3p, new paragraphs 11 and 12).
- the possibility to temporarily import or export jewellery, for example for trade fairs or repairs (Article 3p, new paragraph 13).
- prolonging by six months (until 1 March 2025) the sunrise period during which the G7 certification is recommended to facilitate importation but remains optional, hence postponing the full-traceability and certification scheme (Article 3p, amended paragraph 10).* This allowed importers of diamonds, alternatively, to continue providing documentary evidence for importation of both rough and polished natural diamonds into the EU.
- postponing the ban on jewellery incorporating Russian diamonds processed in third countries (other than Russia), which was foreseen to enter into force on 1 September 2024. It is up to the Council to decide to activate the ban at a later stage in view of action taken within the G7 to pursue that measure (Article 3p, amended paragraph 4).

- clarification that rough diamonds imported through the Authority for the verification of diamonds (listed in Annex XXXVIII B) (i.e. Federal Public Service Economy at the Diamond Office, Belgium) do not need to be resubmitted for verification in view of certification in the case of a subsequent importation (Article 3p, amended paragraph 8).

* Through the adoption of Council Regulation (EU) 2025/395 of 24 February 2025 (the 16th sanctions package), the sunrise period for imports of polished natural diamonds is extended until 31 December 2025 (see Question 22). On 1 January 2026, the traceability and certification for imports of natural diamonds, including diamonds polished in third countries, will become mandatory.

17. Are existing stocks of diamonds subject to the restrictions on diamonds (“grandfathering”)?

Last update: 04 August 2025

No. In principle, stocks of diamonds imported before the ban on Russian diamonds are not subject to the restrictions. Non-industrial, natural, or synthetic diamonds (both rough and polished) of unknown or Russian origin that an economic operator already possessed before the date of applicability of the respective prohibitions can be grandfathered. Thus, the provenance of the diamonds is irrelevant, except for stock held in Russia, which cannot be grandfathered.

For example: if an economic operator purchased diamonds of below 1.0 carat but above 0.5 carat prior to 1 September 2024 (i.e. the weight range banned for importation after 1 September 2024) those diamonds can in principle be grandfathered upon importation in the EU or prior to exportation from the EU.

However, in order to benefit from this grandfathering exception, certain conditions need to be fulfilled. These conditions differ based on the location of the goods before the date of applicability of the respective prohibitions:

A. The products were located in the Union before the prohibition and thereafter exported to a third country other than Russia (paragraph 11 of Article 3p).

Given that the exported products are now held outside of the Union, importers must provide documentary evidence proving that the products were physically located in the Union before the date of applicability of the respective prohibitions.

B. The products were located, polished or manufactured in a third country other than Russia before the prohibition (paragraph 12 of Article 3p).

Depending on the type of product, at the moment of importation into the Union, importers must provide the following evidence:

- for products falling under CN codes 7102 10 00, 7102 31 00 and 7104 21 00: evidence that the products had initially been imported into the third country before the date of applicability of the respective prohibition.

- for products falling under CN codes 7102 39 00 and 7104 91 00, as well as for products listed in Part C of Annex XXXVIII A with unknown or Russian origin: evidence that the products had been finally processed or manufactured in the third country, or had been physically located in a processed or manufactured state in the third country before the date of applicability of the respective prohibition.

18. Where can I find more details on the grandfathering registry?

Last update: 17 December 2025

Operators registered in Belgium and holding diamond stocks in Belgium may opt to submit details of their stocks electronically to the authority listed in Annex XXXVIII B (please see Question 9) for grandfathering. Before exporting such grandfathered diamonds to third countries, they need to be physically inspected by the authority listed in Annex XXXVIII B, after which they will obtain, a ‘GF’ (Grandfather) certificate, which consists of a number mentioned on the import declaration at the end of the import verification.

Operators holding diamond stocks in other Member States may opt to obtain a GF-Certificate number prior to exportation, by submitting their shipment to the Authority listed in Annex XXXVIII B for physical inspection accompanied by documentary evidence.

Please note that registering stock in the grandfathering registry is optional. Subsequent importation into the EU of exported diamonds eligible for grandfathering can also be done using documentary evidence supporting the grandfathered status of the diamonds (see Question 17).

For details on grandfathering in Belgium please consult guidance documents containing practical details on implementation of the grandfathering, here:

<https://www.awdc.be/grandfathering-guidelines>

19. Will grandfathered diamonds receive a G7 certificate that I can use when exporting the diamonds?

Last update: 04 August 2025

No, grandfathered diamonds will not receive a G7 certificate. However, diamond operators may submit diamonds for registration to the authority in Annex XXXVIII B in order to receive a GF certificate prior to their exportation from the EU. The GF certificate is in practice a number mentioned on the import declaration at the end of the import verification. This GF certificate can be used upon subsequent importation into the EU.

20. What is the purpose of the new paragraph 13 of Article 3p?

Last update: 20 December 2024

Paragraph 13 of Article 3p contains an exemption which will allow to import jewellery for participation in trade fairs or for the purpose of repairs.

As noted above (see Questions 2 and 4) a prohibition on jewellery incorporating Russian diamonds processed in third countries (other than Russia) is not in place yet, but Article 3p provides that such a prohibition could be decided by the Council.

In that case (if and when the Council will decide to put in place the prohibition), the new paragraph 13 of Article 3p contains an exemption which would allow to import such jewellery (or other products listed in C of Annex XXXVIII A) that was manufactured before the date of entry into force of the ban, for participation in trade fairs or for the purpose of repairs.

Until the moment that the prohibition will be put in place, the exemption does not apply.

To benefit from this exemption, the products have to be placed under the temporary admission, inward processing, outward processing or temporary export customs procedures when entering or exiting the Union. These are special customs procedures that deviate from definitive importation or exportation.

21. I have a rough diamond which has obtained a G7 certificate from the Authority for the verification of diamonds (listed in Annex XXXVIII B) (i.e. Federal Public Service Economy at the Diamond Office, Belgium) and, after exportation, I would now like to subsequently import it into the EU. Upon subsequent importation, do I need to resubmit the same diamond again for verification to the Authority?

Last update: 17 December 2025

No. However, normal customs and Kimberley Process-related verification will still apply. According to Article 3p, paragraph 8, upon subsequent importation there is no need to submit the diamond for verification and certification at the Authority in Belgium. Upon subsequent importation, it is necessary however to provide traceability evidence, including a G7 certificate.

22. What changes did Council Regulation (EU) 2025/395 of 24 February 2025 (the 16th package of sanctions) introduce to the ban on Russian diamonds?

Last update: 17 December 2025

The following elements were added or modified by Council Regulation (EU) 2025/395 of 24 February 2025 (the 16th package of sanctions).

First, importers of rough natural diamonds are required to present a KP certificate in which the country of mining origin or the countries of mining origin are clearly stated (Article 3p, amended paragraph 8). In other words, it will no longer be possible to use mixed origin certificates with no indication of mining origin, unless already G7/GF certified.

Second, the sunrise period for imports of all diamonds in scope (*i.e.* all natural, non-industrial, rough diamonds equal to or larger than 0.5 carat) is extended until 1 January 2026 (Article 3p,

amended paragraph 10). Therefore, between 1 March 2025 and until 31 December 2025, importers may continue providing documentary evidence for importation of natural diamonds in scope into the EU, as set out in Question 14. On 1 January 2026 the traceability and certification for imports of all diamonds in scope will become mandatory.

23. What is a Due Diligence Statement on Diamond Origin for demonstrating that polished diamonds placed on the EU market are not mined, produced or processed in Russia, as from 1 January 2026?

Last update: 17 December 2025

Operators placing polished diamonds on the EU market must be able to demonstrate, to the best of their knowledge and based on available documentation, that the goods are not of Russian origin.

To facilitate compliance, the use of a Due Diligence Statement on Diamond Origin for polished diamonds is needed where supported by relevant documentation and verification measures, adhering to specific Guidance (see Question 22 and 25). This approach is aligned with ISO traceability principles, OECD due diligence guidance for minerals, and existing international diamond control systems such as the Kimberley Process (KP) and G7/GF declarations.

While it does not preclude the use of other wording, the template below is considered sufficient for incorporating the key obligations for compliance:

“Company name: _____

Address: _____

EORI number: _____

Shipment reference / Invoice number: _____

Date of declaration: _____

I, the undersigned, hereby declare that the non-industrial, natural polished diamonds in this shipment were not mined, extracted, produced, or manufactured wholly or in part in the Russian Federation, notwithstanding whether such diamonds have been substantially transformed into other products outside of the Russian Federation.

I confirm that reasonable steps have been taken to verify the declared origin and to avoid aggregation of diamonds of unknown origin with traceable goods.

I further confirm that these efforts and internal controls conform to the requirements and principles of the Due Diligence on Diamond Origin (as referred to in Questions 24 and 25 of the FAQ “Restrictions on diamonds”).

Signed by: _____

Name and position: _____

Date: _____

(Company stamp if applicable)”

24. What core principles form the basis of the Due Dilligence Statement on Diamond Origin and how should they be applied?

Last update: 17 December 2025

The Due Dilligence Statement on Diamond Origin is based on traceability principles recognised in ISO frameworks and in prevailing industry practices. Operators should apply these principles in good faith when implementing the Due Dilligence Statement on Diamond Origin.

These principles include:

- Transparency: providing clear and accessible information on the origin of diamonds placed on the market.
- Integrity: ensuring that information is accurate, complete and not misleading.
- Granularity: allowing for appropriate levels of detail, from (batch) parcel to single-stone identification when possible.
- Interoperability: ensuring that documentation and data can be shared and verified by national competent authorities.
- Security: protecting the authenticity and confidentiality of records and declarations.
- Proportionality: balancing compliance requirements with administrative feasibility.
- Conformity: aligning practices with relevant laws, ISO standards and industry norms.

25. How does this guidance relate to international traceability standards?

Last update: 17 December 2025

The approach is consistent with:

- ISO 22095:2020 (Traceability of Supply Chains) and related ISO quality and ethical standards.
- OECD Due-Diligence Guidance for Responsible Supply Chains of Minerals (3rd edition).
- Kimberley Process Certification Scheme (KP).
- EU Regulation 2017/821 on responsible sourcing of minerals (3TG).