

## Adopting the packages: a chronology

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The following table summarizes the main steps of the Swiss adoption of the European measures. It is selective and records the measures that matter most for traders, banks and fiduciaries in Ticino.

Swiss decision EU Main measures in Switzerland package 28 Feb 2022 1st and 2nd Listings incl. Putin, Lavrov; freezes 4 Mar 2022 1st to 3rd Total revision; dual-use export ban 13 and 27 Apr 5th Coal ban; services for Kryptowerte und Digital Assets 2022 limited 29 Jun 2022 6th Crude oil embargo; trust services; consulting 3 Aug 2022 7th Gold ban; Sberbank frozen 23 Nov 2022 8th Price cap; IT, engineering, legal advice 31 Jan 2024 12th Diamonds; re-export clause (Art. 14f) Oct 2024 14th IP clause; helium; no "best efforts" duty 12 Aug 2025 18th (part) Price cap USD 47.60 from 3 Sep 2025 25 Feb 2026 19th LNG ban; Kryptowerte und Digital Assets; cap USD 44.10 19 Aug 2026 20th Anti-circumvention tool (Kyrgyzstan)

The dates in the table come from the Federal Council's press releases and from the analyses of law firms that followed each step.<sup>1</sup> The fourth European package of 15 March 2022, which introduced the import ban on Russian iron and steel, was adopted in Switzerland on 18 March 2022, two days after the listing of further steel owners. The steps after the eighth package continued at intervals of a few months and are not all shown.<sup>2</sup>

### 1 The pace of adoption

Two periods can be distinguished. In 2022 the Federal Council adopted the European packages within days or a few weeks. The fifth package of 8 April 2022 was in force in Switzerland on 27 April 2022.<sup>3</sup> From 2024 the intervals grew. The listings of the eighteenth package were adopted on 12 August 2025, while other parts of the package concerning trade in goods, finance and energy were still "under review".<sup>4</sup> The listings of the nineteenth package, which the European Union had adopted on 23

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October 2025, entered into force in Switzerland on 13 December 2025, and the remaining measures only on 26 February 2026.<sup>5</sup> Observers noted that the gap between the European and the Swiss dates had become longer with each package.<sup>6</sup>

The delay has practical consequences in Ticino. During the interval a measure applies in Como and Varese but not in Chiasso and Lugano. A Lugano trader with an Italian subsidiary, an Italian manager or Italian banks is bound by the European measure through those channels, and an Italian national employed in Lugano is personally bound under Article 13 of Regulation (EU) No 833/2014 wherever he works. A Swiss bank that clears euro payments through an Italian or German correspondent will in practice apply the European measure from the first day, because the correspondent will refuse the payment. The Swiss delay therefore benefits only transactions that are entirely Swiss, a category that is small in a border economy.<sup>7</sup>

## 2 Notes

1. Federal Council press release of 28 February 2022 (above); White & Case, "Switzerland adopts new sanctions in line with the EU's fifth package", 2022, <https://www.whitecase.com/publications/alert/switzerland-adopts-new-sanctions-line-eus-fifth-package>; Baker McKenzie, "Switzerland implements sixth EU sanctions package", Sanctions News, 2022, <https://sanctionsnews.bakermckenzie.com/switzerland-implements-sixth-eu-sanctions-package/>; SECO, "Ukraine: Switzerland adopts new sanctions", 3 August 2022, <https://seco.admin.ch/seco/en/home/seco/nsb-news.msg-id-89874.html>; White & Case, "Switzerland implements the remaining measures set out in the EU's 8th sanction package", 2022, <https://www.whitecase.com/insight-alert/switzerland-implements-remaining-measures-set-out-eus-8th-sanction-package>; PwC Switzerland, "Sanktionen RU-UA Konflikt: Update", <https://www.pwc.ch/de/insights/custom-ised/sanktionen-ru-ua-konflikt-update.html> (decision of 31 January 2024 on the twelfth package). ↩
2. Federico Franchini, [swissinfo.ch](https://www.swissinfo.ch), 29 March 2022 (above) (EU ban of 15 March 2022); RSI, "Bandito dalla Svizzera anche l'oligarca Viktor Rashnikov", March 2022, <https://www.rsi.ch/info/ticino-grigioni-e-insubria/Bandito-dalla-Svizzera-anche-loligarca-Viktor-Rashnikov--1787529.html> (Swiss listing of 16 March 2022); Année

- politique suisse / politchronik.swiss, process 64361 (above) (adoption of the fourth package with "weitergehende Massnahmen im Güterbereich" on 18 March 2022). ↩
3. White & Case, fifth package (above) (decisions of 13 and 27 April 2022; entry into force at 18:00 on 27 April 2022; EU package of 8 April 2022). ↩
  4. Federal Council, "Ukraine: Switzerland extends sanctions listings", press release of 12 August 2025, <https://www.admin.ch/en/newsb/kVr4fvF2TU18Pp8JtQLQy>. ↩
  5. Baker McKenzie, "Swiss government implements listings of 19th EU sanctions package", Sanctions News, December 2025, <https://sanctionsnews.bakermckenzie.com/swiss-government-implements-listings-of-19th-eu-sanctions-package/>; Federal Council press release of 25 February 2026, <https://www.admin.ch/de/newsb/O5M0QLVwbVE7A1uwQIJj->. ↩
  6. Baker McKenzie, listings of the 19th package (above) (substantive implementation "unlikely to occur before February 2026"; the eighteenth package took nearly two months). ↩
  7. Council Regulation (EU) No 833/2014 of 31 July 2014, OJ L 229, 31.7.2014, Art. 13 (application to nationals of a member state inside or outside the Union and to legal persons incorporated in a member state), <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32014R0833>. ↩

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