

Chiasso and the customs at the southern border

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The physical front line of sanctions and export controls in Ticino is the customs. The motorway crossing of Chiasso-Brogeda, the railway station of Chiasso and the crossings of Stabio and Gaggiolo carry a large part of the road and rail freight between Lombardy and Ticino, and the customs warehouses and logistics centres of the Mendrisiotto described in Chapter F.III depend on them.¹ Since 2022 the Federal Office for Customs and Border Security has combined the former customs administration with the border guard. Its transformation programme DaziT is replacing the old declaration systems with the digital goods traffic system Passar. The changeover for transit and export (Passar 1.0) has been completed, with the old e-dec export application in use until the end of 2025, while the first stages of Passar 2.0 for imports have been available for pilot operations since the second quarter of 2026.²

The transformation has been criticized at the border itself. In February 2026 a Chiasso freight forwarder, Marco Tepoorten, argued in the Ticino press that the reform had produced more complex and problematic processes, that the export system Passar had been introduced without clear instructions and training, and that the merger of customs specialists with border guards had been a mistake. In his view declaration and physical control had been separated, so that trucks crossed the border without inspection, and "a digital customs administration without human know-how, as currently conducted, is blind".³ The criticism matters for sanctions enforcement because the Swiss cases discovered so far have been almost entirely cases found by customs officers who examined consignments. The Ukraine Ordinance also contains provisions on the placing of goods under a customs procedure (Art. 31a). According to SECO, goods that were already in Switzerland and had been presented to customs before a ban took effect may still be bought or transported under that article, as in the case of iron and steel products with Russian inputs presented before 30 September

2023. For goods held in the customs warehouses of the Mendrisiotto, the date of presentation to customs can thus decide whether a sale is lawful.⁴

1 Circumvention through third countries

The principal method of circumvention is the shipment of goods to a third country from which they are re-exported to Russia. The figures for Switzerland show the pattern. In 2022, the first year of the war, Swiss exports to Uzbekistan rose by 24 per cent, to Kazakhstan by 39 per cent and to Armenia by 170 per cent compared with 2021, and in 2023 the growth extended to watches, precision instruments, jewellery and machinery.⁵ Armenian imports of Swiss goods more than tripled in the first year of the war, while Armenian re-exports to Russia rose by 198 per cent.⁶ Kazakhstan, Kyrgyzstan and Armenia belong with Russia and Belarus to the Eurasian Economic Union, which has no customs borders between its members, so that goods declared for Almaty or Yerevan can continue to Moscow without further formalities. SECO reported that it had blocked several Russian attempts to procure sensitive dual-use goods through Kazakhstan, Uzbekistan and Armenia.⁷

Turkey and the United Arab Emirates are the other main hubs. Turkey is a principal supplier and customer of Lugano's steel traders and has become a principal transit point for European goods destined for Russia. The United Arab Emirates host trading companies that took over much of the Russian oil trade after 2022, and the first Swiss sanctions case known to have been taken over by the Office of the Attorney General concerned a subsidiary in Dubai.⁸ The international answer is the list of common high priority items, drawn up by the European Union with the United States, the United Kingdom and Japan. It identifies the goods found in Russian weapons on the battlefield, such as integrated circuits, radio frequency transceiver modules and components for their manufacture, and since February 2024 also computer numerical control machine tools. The list covered fifty customs codes in 2024.⁹ Switzerland incorporated these items into Annex 31 of its ordinance, to which the re-export clause of Article 14f refers.¹⁰ With the twentieth package of August 2026 Switzerland went one step further and prohibited, for the first time, the export of sensitive goods to a third country, Kyrgyzstan, under the European anti-circumvention tool.¹¹

2 Notes

1. See Chapter F.III on the logistics of the Mendrisiotto and the customs warehouses. ↩

2. Federal Office for Customs and Border Security (BAZG), "Passar", <https://www.bazg.admin.ch/de/passar-warenverkehrssystem> ("Die Umstellung in den Bereichen Durchfuhr und Ausfuhr (Passar 1.0) ist abgeschlossen"; "Die ersten zwei Ausbauschritte von Passar 2.0 (Einfuhr Standard) stehen ab dem zweiten Quartal 2026 für Piloteinsätze bereit"); BAZG, "Umstellung auf Passar Ausfuhr", <https://www.bazg.admin.ch/de/umstellung-auf-passar-ausfuhr> ("E-dec Export bis Ende 2025"; automated checks of regulated goods with DaziT). ↩
3. laRegione, report of 10 February 2026 on the criticism of the customs reform by a Chiasso freight forwarder, <https://www.laregione.ch/cantone/ticino/1903418/servizi>. ↩
4. Ukraine Ordinance, Art. 31a ("Bestimmungen zur Überführung von Gütern in ein Zollverfahren"), table of contents (above); SECO, Auslegungshilfe Sanktionsmassnahmen (above), section 2.4.5 ("Wenn sich die betreffenden Güter bereits in der Schweiz befinden und vor dem 30. September 2023 dem Zoll gestellt wurden, ist Artikel 31a anwendbar und die Güter können gekauft oder transportiert werden"). ↩
5. SRF, 16 August 2023 (above). ↩
6. Rahel Winkelmann, "Schweizer Exporte: Verdacht auf Umgehungsgeschäfte an Russland", [swissinfo.ch/SRF](https://www.swissinfo.ch/ger/aussenpolitik/schweizer-exporte-verdacht-auf-umgehungsgesch%C3%A4fte-an-russland/73101112), 28 February 2024, <https://www.swissinfo.ch/ger/aussenpolitik/schweizer-exporte-verdacht-auf-umgehungsgesch%C3%A4fte-an-russland/73101112>. ↩
7. SRF, 16 August 2023 (above). ↩
8. SRF, 7 March 2024 (above). ↩
9. European Commission, DG Trade, "EU and partners expand list of common high priority items to further weaken Russia's war effort", 23 February 2024, https://policy.trade.ec.europa.eu/news/eu-and-partners-expand-list-common-high-priority-items-further-weaken-russias-war-effort-2024-02-23_en. ↩
10. Swissmem, re-export clause (above) (high priority goods in Annex 31). ↩
11. Federal Council press release of 19 August 2026 (above). ↩

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