

Gold, diamonds and the Ticino refineries

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Three of the four large Swiss gold refineries are located in the Mendrisiotto and the Sottoceneri: Valcambi in Balerna, PAMP in Castel San Pietro and Argor-Heraeus in Mendrisio.¹ The gold ban therefore has a particular weight for Ticino. Switzerland prohibited the purchase, import and transport of gold and gold products from Russia, together with the related services, with effect from 18:00 on 3 August 2022, following the seventh European package.² Before that date the London bullion market had closed itself to Russian gold in March 2022, and bars produced by Russian refineries after 7 March 2022 could no longer be marketed in Switzerland either.³ In June 2022 it became known that three tonnes of gold produced in Russia in March 2022 had been imported into Switzerland from the United Kingdom in May 2022. The customs administration and SECO examined the imports, which predated the Swiss ban, and declined to name the recipient on grounds of confidentiality.⁴

Diamonds followed with the twelfth package. Since its adoption by Switzerland on 31 January 2024, Article 14e of the Ukraine Ordinance prohibits the purchase, import and transfer of Russian diamonds and of products incorporating them, with a phased extension to diamonds processed in third countries.⁵ For the Ticino jewellery and watch industry, which depends on Antwerp and Dubai for its stones, the processing rule requires evidence of origin of the kind that the steel trade already knew.

1 Exports to Russia and the duty to prevent re-exports

The export bans of the Ukraine Ordinance cover dual-use goods, goods that could contribute to the military and technological enhancement of Russia, goods for the energy, aviation and maritime sectors and luxury goods (Art. 3–11a and 14b). Some of these concern Ticino directly. The luxury goods ban applies to the watches, leather goods and garments that the logistics companies of the Mendrisiotto distribute, described in

Chapter F.III. SECO's administrative penalties since 2024 have concerned, among others, leather goods, luxury jewellery and clothing.⁶ A distributor that ships luxury goods from Stabio to a customer in Almaty or Yerevan must therefore ask whether the goods will remain in Kazakhstan or Armenia.

Since 20 March 2024 Article 14f of the Ukraine Ordinance has formalized that question. Exporters that sell, supply, transfer or export the goods listed in Annexes 3 and 19 and the common high priority items in Annex 31 to a third country other than a member of the European Economic Area or a partner country must contractually prohibit the re-export of these goods to Russia or for use in Russia. The contract must provide adequate remedies for breach. The exporter must report breaches to SECO without delay. Contracts concluded before 1 February 2024 could be performed without the clause until 20 December 2024.⁷ The provision was introduced with the twelfth package, which the Federal Council adopted on 31 January 2024.⁸ It corresponds to the so-called "no Russia clause" of Article 12g of Regulation (EU) No 833/2014, discussed below in its Italian context.

Common misconception. Swiss sanctions are often thought to concern only goods that cross the Swiss border. For a merchanting economy this is a dangerous error. The ordinance prohibits the purchase of Russian iron and steel, gold and other listed goods and the brokering, financing and insurance connected with them, wherever the goods are located. A Lugano trader that buys Russian steel in the Black Sea and sells it to Turkey without the cargo ever touching Switzerland violates Article 14a of the Ukraine Ordinance in the same way as an importer in Chiasso.

2 Notes

1. Open, "Svizzera, inchiesta sull'oro russo", 26 June 2022, <https://www.open.online/2022/06/26/svizzera-inchiesta-oro-russo-dogana-sequestro-oligarchi> (three of the four refineries in Ticino); names and locations as given in Chapter F.I. ↩
2. SECO, press release of 3 August 2022 (above). ↩
3. Open, 26 June 2022 (above) ("Tutti i lingotti prodotti da raffinerie russe dopo il 7 marzo 2022 non possono più essere commercializzati in Svizzera"; the London market no longer accepted Russian gold). ↩
4. Open, 26 June 2022 (above) (three tonnes, value about CHF 200 million, produced in Russia in March 2022, imported from the United Kingdom in May 2022; examination by customs and SECO; recipient not disclosed). ↩

5. Regulation (EU) 2023/2878 (above), Art. 3p (diamonds from 1 January 2024; processed diamonds from 1 March 2024 with later thresholds); cash.ch, "Diese EU-Sanktionen gegen Russland hat die Schweiz übernommen", 24 February 2024, <https://www.cash.ch/news/top-news/diese-eu-sanktionen-gegen-russland-hat-die-schweiz-ubernommen-686868> (Swiss adoption of the diamond ban with the twelfth package). ↩
6. Duane Morris, "Switzerland – 13 administrative penalties for sanctions offences (March 2024 to July 2025)", European Sanctions Enforcement blog, 25 August 2025, <https://blogs.duanemorris.com/europeansanctionsenforcement/2025/08/25/switzerland-13-administrative-penalties-for-sanctions-offences-march-2024-to-july-2025/>. ↩
7. Swissmem, "Russland-Sanktionen: Vertragspflicht zur Verhinderung der Wiederausfuhr", <https://www.swissmem.ch/de/wissen/krieg-in-der-ukraine/russland-sanktionen-vertragspflicht-zur-verhinderung-der-wiederausfuhr.html>; Xenia Pisarewski (Pestalozzi), "Switzerland has adopted the European Union's 13th sanctions package", Mondaq, 2024, <https://mondaq.com/export-controls--trade--investment-sanctions/1457248/>. ↩
8. PwC Switzerland, "Sanktionen RU–UA Konflikt: Update" (above). ↩

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