

The record so far

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The enforcement record shows many small cases and very few large ones. The following table summarizes the figures that SECO has communicated or that have been reported on the basis of its information.

Date	Proceedings opened	Outcome reported	Nov 2022	30 (reporting duties)
Pending	Mar 2023	More than 20	2 penalties, 9 discontinued	Jul 2024
56	41 concluded,	15 penalties	Mar 2025	68 24 final convictions

The sources of the table are cited in the note.¹ The fines that SECO has imposed are modest. Between March 2024 and July 2025 it issued thirteen penalty notices totalling CHF 23,800. The highest was CHF 5,000. All concerned negligent violations involving goods such as weapon parts, leather goods, luxury jewellery, heating resistors, flowmeters, satellite parts, cables, valves and analytical instruments.² The first two final penalties, reported in March 2023, had concerned 1,850 kilograms of lubricants for Russia and pumps and spare parts for Belarus, punished with fines of CHF 4,500 and CHF 2,000.³ By 2025 the authorities had received more than 600 reports of suspected violations.⁴

Critics have drawn the conclusion that the system finds what customs happen to stop at the border and misses the circumvention organized through foreign subsidiaries, front companies and financial transactions. The Social Democratic National Councillor Fabian Molina put it in these terms in 2023, when he said that the cases concerned only goods discovered by chance.⁵ The National Council adopted in September 2023 a postulate of its Foreign Affairs Committee asking the Federal Council to report on the enforcement of sanctions in the commodity sector.⁶ The criticism is partly answered by the referral of serious cases to the Office of the Attorney General. The structural point remains: Switzerland enforces sanctions through an administrative authority with limited investigative means, while Italy, as the following sections show, relies on a financial police force with the powers of a criminal investigator.

1 Notes

1. Moneycab, 1 December 2022 (above) (30 administrative proceedings for violations of reporting duties); SRF, 23 March 2023 (above); Duane Morris, "Switzerland – updated sanctions enforcement statistics with 5 new fines", European Sanctions Enforcement blog, 18 July 2024, <https://blogs.duanemorris.com/europeansanctionsenforcement/2024/07/18/switzerland-updated-sanctions-enforcement-statistics-with-5-new-fines/> (56 proceedings, 41 concluded, 26 discontinuation orders, 14 penalty notices, 1 penalty order); swissinfo.ch (Bloomberg), "Swiss frozen Russian asset tally jumps to \$8.4 billion", 1 April 2025, <https://www.swissinfo.ch/eng/swiss-frozen-russian-asset-tally-jumps-to-%248.4-billion/89095581> (68 proceedings, 24 final convictions). ↩
2. Duane Morris, 25 August 2025 (above) (cases 16 to 28, total CHF 23,800, all negligent). ↩
3. SRF, 23 March 2023 (above). ↩
4. swissinfo.ch, 1 April 2025 (above) (more than 600 suspected cases); for an earlier figure of about 300 reports see Bluewin, "Swiss parts in Russian weapons: Seco cooperates with companies", 2024, <https://www.bluewin.ch/en/news/swiss-parts-in-russian-weapons-seco-cooperates-with-companies-2287668.html>. ↩
5. SRF, 23 March 2023 (above) ("Es geht hier nur um Fälle im Güterbereich, die durch Zufall entdeckt wurden"). ↩
6. plattformJ, report on the National Council session of 21 September 2023, <https://www.plattformj.ch> (postulate of the Foreign Affairs Committee on the enforcement of sanctions in the commodity sector). ↩

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