

Export control

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Beside the sanctions, the trade in certain goods is subject to export control. The Federal Act on the Control of Dual-Use Goods, Specific Military Goods and Strategic Goods, the Goods Control Act, and its ordinance require a licence for the export of goods that can be used for both civilian and military purposes, in accordance with the international export control regimes in which Switzerland participates.¹ The War Material Act governs the export of weapons and military equipment.²

For the commodity traders, export control is usually of secondary importance, since raw materials are rarely dual-use goods. It becomes relevant for certain metals and materials, such as specific alloys, rare earths and materials used in nuclear or aerospace applications, and for the trade in equipment and technology that some traders conduct alongside their commodity business. The twenty-first European package extended the export restrictions to nickel and beryllium powder and to aerospace materials, which shows that the line between commodity trade and controlled goods can shift.³ The reports that Swiss components had been found in Russian weapons, and the proceedings that SECO has opened for violations of the Russia sanctions, show the attention that the authorities pay to the circumvention of export controls through third countries.⁴

1 Notes

1. Güterkontrollgesetz of 13 December 1996 (GKG, SR 946.202), Art. 1, and Güterkontrollverordnung of 3 June 2016 (GKV, SR 946.202.1), Arts. 1 and 3, droit-bilingue.ch: the GKV governs the export, import, transit and brokering of nuclear goods, dual-use goods and specific military goods that are the subject of internationally non-binding control measures, and of strategic goods covered by international

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agreements; the export of goods listed in Annexes 2 to 4 requires a licence from SECO. ↩

2. Kriegsmaterialgesetz of 13 December 1996 (KMG, SR 514.51), Art. 1, droit-bilingue.ch: the Act controls the manufacture and transfer of war material and the related technology in order to fulfil Switzerland's international obligations and to uphold its foreign policy principles. ↩
3. Douana, "Das 21. EU-Sanktionspaket": export restrictions now cover nickel and beryllium powder, aerospace materials and drone-specific equipment; the lists of dual-use restricted entities grow by 55 parties, 27 of them in third countries. ↩
4. swissinfo.ch (Keystone-SDA), "Schweizer Teile in russischen Waffen: Seco kooperiert mit Firmen", 17 July 2024: SECO works with companies to prevent Swiss components from ending up in Russian weapons, most of which reach Russia indirectly through third countries; SECO had opened 56 administrative criminal proceedings for violations of the Russia sanctions, 41 of them concluded (26 discontinued, 14 penalty orders, one fine). Tages-Anzeiger reported the same figure under the headline "Seco eröffnete 56 Verfahren wegen Verstössen gegen Russland-Sanktionen". ↩

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