

Neutrality and the adoption of EU sanctions

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Since the Federal Council is not obliged to follow the European Union, every EU package raises the question whether Switzerland should adopt it, adopt it in part or stay away. The Federal Council weighs foreign-policy, neutrality-law, economic and legal considerations in each case. The GPK-S asked in 2018 and again in 2023 that all criteria be listed in each proposal to the Federal Council, even where a criterion is marked as not applicable, so that the decision could be reconstructed.¹ In practice the decisive factor is usually the risk of circumvention. Where the European Union sanctions a country with which Swiss firms trade, Switzerland is exposed to the reproach that it offers a back door. That risk was the explicit rationale of the old Ukraine ordinance of 2014, which did not adopt the EU sanctions against Russia as such but prohibited transactions designed to circumvent them.²

The practice of the Syria and Iran regimes shows the same pattern. Switzerland adopted sanctions against Syria on 18 May 2011, following the EU measures of 9 May 2011. After the fall of Bashar al-Assad on 8 December 2024 and an EU decision of 27 May 2025, the Federal Council lifted most economic measures on 20 June 2025, including restrictions on financial services and precious metals, and removed twenty-four entities, among them the Syrian central bank, from the list. Targeted measures against persons linked to the former regime and export restrictions on military and repression goods remained in place.³ Iran illustrates the interaction of UN and EU measures. After the United Kingdom, France and Germany triggered the “snapback” mechanism of the 2015 nuclear agreement, the earlier UN resolutions revived on 28 September 2025. The European Union reactivated its suspended measures on 29 September. On 12 December 2025 the Federal Council totally revised the Iran ordinance, restored the measures to the level before 2015 and added measures in the commodities sector, with the stated aim of preventing Switzerland from

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being used to circumvent EU sanctions and of increasing legal certainty for Swiss firms operating internationally.⁴

Swiss neutrality also allowed a distinctive service in the Iran context. In early 2020 Switzerland launched the Swiss Humanitarian Trade Arrangement, a payment channel for food and medicines to Iran that had been negotiated with the United States so that Swiss exporters could deliver humanitarian goods without risking American secondary sanctions. A trial transaction in January 2020 involved Novartis pharmaceuticals worth about EUR 2.3 million. The first regular transaction, confirmed on 27 July 2020, concerned a drug used to treat iron overload in cancer patients.⁵ The arrangement shows that the Swiss role in sanctions is not limited to implementing measures. Switzerland also acts as intermediary where the extraterritorial reach of American sanctions blocks trade that all sides wish to permit.

The Russian invasion of Ukraine tested the Swiss approach more severely than any earlier crisis. On 23 February 2022 the Federal Council condemned Russia's actions in eastern Ukraine, yet it hesitated to adopt the EU sanctions and said it needed to analyse them first. Most political parties, large parts of the public and international partners, including the United States and the European Union, criticised that hesitation. After an extraordinary session four days later the Federal Council reversed its course.⁶ On 28 February 2022 it announced that Switzerland would adopt the EU packages of 23 and 25 February, freeze the assets of the listed persons and companies with immediate effect and apply the financial sanctions against President Vladimir Putin, Prime Minister Mikhail Mishustin and Foreign Minister Sergei Lavrov.⁷ The government maintained throughout that these steps did not violate neutrality, since they were economic measures. By 2024 Switzerland had adopted fourteen EU packages. It continued to refuse, on grounds of neutrality law and the War Material Act, requests from third states to re-export Swiss war material to Ukraine.

The adoption of EU sanctions against Russia provoked a constitutional counter-movement. A popular initiative entitled “Wahrung der schweizerischen Neutralität” asked that permanent armed neutrality be written into the Constitution, that Switzerland abstain from military alliances and that it refrain from non-military coercive measures against belligerent states, with an exception for measures of the United Nations. The Federal Council and Parliament recommended rejection without a counter-proposal. According to the Federal Department of Foreign Affairs, acceptance would probably have required Switzerland to lift the

sanctions against Russia that it had adopted from the European Union.⁸ Law firms warned their clients that Switzerland would be constitutionally prohibited from implementing non-military coercive measures if the initiative were approved.⁹ The vote took place on 27 September 2026. According to the first projection of the research institute gfs.bern, about 72 per cent of voters rejected the initiative.¹⁰ The result gives the practice of adopting EU sanctions a democratic confirmation that the Federal Council's decision of February 2022 lacked. It does not, however, turn the practice into an obligation, since each package still requires a separate decision.

1 Notes

1. GPK-S, “Nachkontrolle: Beteiligung des Bundes an Wirtschaftssanktionen” (cited above). ↩
2. Verordnung über Massnahmen zur Vermeidung der Umgehung internationaler Sanktionen im Zusammenhang mit der Situation in der Ukraine of 2014, totally revised by the Federal Council on 4 March 2022 as the Verordnung über Massnahmen im Zusammenhang mit der Situation in der Ukraine, SR 946.231.176.72: Année politique suisse, politichronik.swiss, “Die Schweiz übernimmt die EU-Sanktionen gegen Russland”, <https://politichronik.swiss/de/prozesse/64361-die-schweiz-uebernimmt-die-eu-sanktionen-gegen-russland>; current title and SR number at <https://www.droit-bilingue.ch/de-fr/9/94/946.231.176.72-index.html>. ↩
3. Federal Council, “Bundesrat hebt Wirtschaftssanktionen gegenüber Syrien auf”, 20 June 2025, https://www.admin.ch/de/newnsb/IaYrkRP-T0h_iNp_6PUeM, with reference to AS 2025 410. ↩
4. Federal Council, “Totalrevision der Verordnung über Massnahmen gegenüber der Islamischen Republik Iran”, 12 December 2025, <https://www.admin.ch/de/newnsb/ML0cUymNp0kYO9UTn4nAy>. See also SRF, “Schweiz führt Sanktionen gegen den Iran wieder ein”, <https://www.srf.ch/news/international/nach-ablauf-der-frist-schweiz-fuehrt-sanktionen-gegen-den-iran-wieder-ein>. ↩
5. swissinfo.ch, “Iran receives first shipment under Swiss humanitarian trade channel”, 27 July 2020, <https://www.swissinfo.ch/eng/politics/iran-receives-first-shipment-under-swiss-humanitarian-trade-channel/45929264>. See also Baker McKenzie, “First US OFAC-consented humanitarian trade arrangement to take effect”,

<https://sanctionsnews.bakermckenzie.com/first-us-ofac-consented-humanitarian-trade-arrangement-to-take-effect/> (not opened). ↩

6. Année politique suisse / Politchronik, “Die Schweiz übernimmt die EU-Sanktionen gegen Russland”, <https://politchronik.swiss/de/prozesse/64361-die-schweiz-ubernimmt-die-eu-sanktionen-gegen-russland>. The entry quotes Foreign Minister Ignazio Cassis as saying that the Federal Council had rarely decided something so important so quickly. The entry also records that by 2024 Switzerland had adopted fourteen EU packages and that it continued to refuse requests to re-export Swiss war material to Ukraine. ↩
7. Federal Council, “Schweiz übernimmt EU-Sanktionen gegen Russland”, press release of 28 February 2022, <https://www.admin.ch/gov/de/start/dokumentation/medienmitteilungen/bundesrat.msg-id-87386.html>. ↩
8. Federal Department of Foreign Affairs, “Neutralitätsinitiative”, <https://www.eda.admin.ch/de/neutralitaet>; Federal Council, “Neutralitätsinitiative”, <https://www.admin.ch/de/neutralitaetsinitiative>. ↩
9. CMS Switzerland (Vaik Müller and Serge Pannatier), “Switzerland’s adopts the 20th sanction package against Russia”, 24 August 2026, <https://cms.law/en/che/legal-updates/switzerland-s-adopts-the-20th-sanction-package-against-russia>. ↩
10. swissinfo.ch, “Resultate der Abstimmung vom 27. September 2026 in der Schweiz”, <https://www.swissinfo.ch/ger/abstimmungen/resultate-der-abstimmung-vom-27-september-2026-in-der-schweiz/92029675>.
The figure is a projection published on the day of the vote. The official final result was not yet available when this chapter was completed. ↩

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