



Sanctions – Russian Iron and Steel products

Important update 6.10.2023

To whom it may concern

In response to the many emails that we are receiving requesting to know if every steel part we supply can be verified as having no Russian steel content, and requiring the mill cert for each part, this is our considered response.

In late July we communicated our initial plans for the implementation of the European Directive, [click here](#) to view. This link provides the detail of the regulation.

The effective date was the 30th of September and there has been much debate in the fastener industry, between BAIFD and EFDA, and EU and UK bodies such as the DBT - Department of Trade and Industry, as to how it can be implemented. The timeframe to plan and meet this Directive was incredibly short.

The Directive stated that all product coming into the EU and the UK had to have documented proof of mill certification that traced the metal back to the heat furnace that melt and pour the steel, then named as a billet. Today for PPAP products and special parts requiring documentation we provide material test certification, as mill certification is not a requirement. This has always sufficed before. To be asked to now provide billet detail on product already in our warehouse, on the seas and in WIP is virtually impossible. Failure to provide this would effectively prevent goods being received into the EU and UK. We therefore addressed 3 key areas:

- Customer Supply Chain
- Stock already in TR 's warehousing, on the seas and in WIP
- Clear communication to Suppliers and what the future requirements will be

There have been serious concerns around the interpretation and implementation of the Directive. France, Germany, Austria, Italy and the UK have been lobbying to have this Directive simplified and made workable.

The EU Sanction Directive requirements were modified yesterday. The EU Commission has changed from evidence based (MTC – mill test certs) to a “Declaration Statement”(long or short term). We are communicating this to our suppliers immediately. Additionally, every TR purchase order raised as of today has a Statement saying that we will not accept product produced from Russian wire or billet.

The permissible import documents have been expanded by the EU Commission.



[See c350 pages link here.](#)

Instruction to our Suppliers as of today:

"We wish to have Mill Test Certificates for all shipments wherever possible, however, the EU and UK customs can accept alternative documents. For example, a producer's or exporters declaration confirming that, after exercising due diligence, the imported product does not contain any Russian steel or iron. This can be for a single consignment or a long-term declaration.

If submitting a declaration, please note that the customs authority may request further evidence to prove the due diligence of the declaration statement."

The important point in this statement is proof of 'exercising due diligence'. We still need to be able to prove that we have conducted our due diligence when requested.

We are therefore re-issuing the above statement to our Suppliers, including our own manufacturing, to ensure that Russian steel does not enter our Supply Chain and eliminate that risk.

We believe that there may also be a caveat to consider that goods TR received prior to June the 23rd 2023 are exempt from this Directive. We are having that point checked legally.

Long Standing Declaration – We can confirm that our products do not contain Russian steel made from Russian Billets. Mill certification is not mandatory under the latest Directive and is replaced by this statement.

We hope this clarifies the current situation.

Please do not hesitate to make contact if you need any further clarification.

Yours sincerely

On behalf of **TR Fastenings Ltd**



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