

The Secretary General

Mairead McGuinness  
Commissioner  
Directorate-General for Financial Stability,  
Financial Services and Capital Markets Union  
European Commission  
*Via email: CAB-MCGUINNESS-CONTACT@ec.europa.eu*

Paris, 09 March 2022

Dear Commissioner McGuinness,

I am writing to request clarification, on behalf of the international business community, regarding the treatment of customs transit procedures under the new European Union sanctions on the Russian Federation and the Republic of Belarus.

Specifically, we have become aware that the customs authorities of a number of EU member states have recently blocked the shipment of goods by road or rail through Russia and Belarus to third countries such as Kazakhstan and Uzbekistan.

In this context, there is now significant uncertainty within the business community as regards to the applicability of the new sanctions instruments to goods transiting through Russia or Belarus to final destinations in countries not covered by any such restrictions to trade. This, as you will appreciate, is a particularly acute problem given the difficulty of servicing trade with a number of countries in Central Asia without access to ground routes through the Russian and Belarus.

As such, we would welcome an official clarification from DG FISMA as to whether customs transit across Russia and Belarus to neighbouring third countries is prohibited under EU sanctions. Should this not be the case, we would encourage the issuance of guidance, as appropriate, to the relevant authorities in EU member states in order to avoid any unintended impacts on important trade routes within the region.

Businesses – large and small – would greatly welcome any guidance that will support their compliance with all prevailing EU sanctions, while also reducing trade disruptions for third countries that may be affected unintentionally.

We fully appreciate the complexities of this situation and thank you in advance for any clarification that can be provided within the remit of DG FISMA.

Yours sincerely,



John W. H. Denton AO  
Secretary General of International Chamber of Commerce

*CC: relex-sanctions@ec.europa.eu*