

Dear diamond trader,

The FPS Economy has informed us that it will carry out random checks on import shipments of polished diamonds.

These checks are related to the new measure that has been in force since January 1st, 2026 in the framework of the sanctions against Russia: for every import of polished diamonds, a Due Diligence Statement on Diamond Origin (DDS) must be attached to the customs declaration.

More information (<https://www.awdc.be/update-january-1-2026>)

Please read this email carefully. Providing incomplete or incorrect information may have consequences for your company.

1. Who do these checks apply to?

The random checks apply exclusively to companies importing polished diamonds that fall within the scope of the measures (i.e. equal to or larger than 0,5 carat).

2. What is being checked?

The FPS Economy verifies whether you have made sufficient efforts to ensure that the imported diamonds are not of Russian origin.

They do so by verifying that:

* The Due Diligence Statement on Diamond Origin (DDS) is correctly completed and signed, and

* The DDS is supported by sufficient documentary evidence - You made reasonable efforts to verify the origin.

3. Which documents (supporting evidence) must you be able to provide?

First and foremost, you must be able to present a fully completed and signed Due Diligence Statement on Diamond Origin (DDS).

In addition, the DDS must be supported by documents demonstrating that you have verified, in a reasonable and risk-based manner, that the diamonds are not of Russian origin. In practice, you should be able to provide all possible documentation proving that the goods are of non-Russian origin.

Possible supporting documents include:

1. Strong evidence (if available):

* Documents or other proof from commercial traceability systems or platforms (if applicable)

2. Other possible evidence:

* One or more G7 or GF declarations (for rough diamonds) with a verifiable link to the polished goods being imported

* One or more Kimberley Process certificates for rough diamonds (single or mixed origin, with clearly stated countries of mining) clearly linked to the polished goods being imported

3. Additional commercial and transport documents:

* Invoices

* Pro-forma invoices or consignment notes

* Customs import and export declarations

* Packing lists and transport documents (e.g. airway bills)

* Laboratory reports (if available)

4. Stock Management System Records:

* Stock Management System data showing the country of mining origin.

* Important: If you list a country of mining origin in your system (i.e. Excel file), you should also keep supporting evidence. At the time of an inspection, along with the data in the Stock Management System, you will need to share the email you received from your supplier that confirms the same mining origin. Since this is a best-effort case, you need to show that you made an effort to request/receive this information from your supplier. This qualifies as seeking origin information through a reasonable, risk-based approach.

This list is not exhaustive.

Authorities will assess the credibility and consistency of the documents on a case-by-case basis, considering the risk and the information reasonably available at the time of import.

Please note: for certain supporting documents, you may need to request them from your supplier.

IMPORTANT:

You must be able to demonstrate that you have taken reasonable steps to verify that the diamonds you import are not of Russian origin.

In practice, this means proving that you have made all reasonable efforts to verify origin. You can do so by systematically documenting all actions taken, such as:

* Retaining email correspondence with suppliers or intermediaries

- * Presenting internal procedures or control mechanisms
- * Providing extracts of in-house compliance measures
- * Submitting any other relevant documents supporting your verification process

4. When do the checks take place?

Currently, checks are carried out after the goods have been imported and customs clearance has been completed.

However, once the text of the Regulation is officially published, the FPS Economy will, for certain files, already request supporting documents at the time of the customs declaration. Publication of the text is expected on 23 February 2026.

5. How does a check work?

- * The FPS Economy will contact you by email.
- * They will request the documents related to a previously imported shipment of polished diamonds (see section 3 above).
- * You will have 10 calendar days to reply, and can do so by sending the requested information to:
info-diamondsanctions-be@economie.fgov.be (mailto:info-diamondsanctions-be@economie.fgov.be)

6. What if you do not provide the information (on time)?

If the requested documents are not submitted or are submitted late, the FPS Economy will be required to take appropriate measures.

Brief reminder: what do you declare with the DDS?

With the Due Diligence Statement on Diamond Origin (DDS), you declare that:

- * the diamonds you are importing are not of Russian origin, and
- * you have made sufficient efforts to verify this.

Each DDS must be supported by (documentary) evidence demonstrating that you have verified the origin in a reasonable and risk-based manner.

If you have any questions or doubts about the DDS or the required supporting documents, please contact AWDC via compliance@awdc.be (mailto:compliance@awdc.be?subject=&body=) or visit the Helpdesk (open on Tuesday, Wednesday and Thursday, from 10 am to 1 pm).

Together, we will make sure you are well prepared for a potential inspection.

Kind regards,