EU Import Guidelines

Update January 1, 2026

The final phase of sanctions regulations to ensure no rough or polished diamonds of Russian origin enter the EU goes into effect on January 1st, 2026.

1. Introduction

Starting 1 January 2026, all importers of natural diamonds, both rough and polished, must comply with a traceability-based certification and evidence mechanism. This will apply to all diamonds entering EU customs territory (via Diamond Office) that are in scope (≥ 0.5ct).

For rough diamonds, the import process remains the same as per the last update in March 2025.

For polished diamonds, a new system comes in place: from 1 January 2026, importers of polished diamonds will need to provide a **"Due Diligence Statement on Diamond Origin"** either prior to or at the time of importation. In this document they declare that the diamonds they import are not of Russian origin, and that they have made sufficient efforts to verify this. Upon demand from the authorities in Diamond Office, importers should be able to provide documentary evidence, processes and practices that underpin this "Due Diligence Statement on Diamond Origin" and prove the non-Russian origin of the imported diamonds.

The Due Diligence Statement on Diamond Origin will need to accompany the shipment.

Upon arrival at Diamond Office, competent authorities will verify the documentary evidence.

This new approach allows diamond companies to demonstrate the non-Russian origin of the imported diamonds in a transparent, robust yet practical and feasible way. The system not only reinforces international cooperation under the Kimberley Process but also positions the EU as a leader in promoting ethical sourcing, compliance, and accountability within the global diamond industry.

2. Practical guidance for importers

Companies importing diamonds into EU Single market must:

For rough diamonds:

Provide a Kimberley Process (KP) certificate of either single origin or mixed origin, with the countries of origin listed on the KP Certificate. Certificates without this information will not be accepted, except under the grandfathering[1] exemption.

For polished diamonds:
Submit a signed '**Due Diligence Statement on Diamond Origin'**, confirming that the diamonds in the shipment are, to the best of their knowledge and based on available documentation, not of Russian origin.

Authorities are allowed to request evidence that underpins the "Due Diligence Statement on Diamond Origin" made by the importer. In that case, the importer should be able to demonstrate that it went through a reasonable, risk-based verification process to ensure that the goods are non-Russian. The importer should be able to provide documentary evidence, processes, or practices implemented, proving all reasonable efforts have been made to verify the non-Russian origin. This is an 'effort obligation' ("best effort"), not a 'result obligation'.

For synthetic rough and polished, the Diamond Office Template G7/GF declaration still applies.

[1] Grandfathering: "Grandfathered Goods" (GF-goods), non-industrial, natural, or synthetic (laboratory-grown / lab-grown) diamonds (both rough and polished) of unknown or Russian origin that a company already possessed before January 1, 2024.

3. FAQ

When do you use the Due Diligence Statement on Diamond Origin?

The Due Diligence Statement on Diamond Origin must be submitted for each shipment and must accompany the relevant customs or Diamond Office documentation. A single Due Diligence Statement on Diamond Origin may cover multiple parcels within a shipment

The Due Diligence Statement on Diamond Origin must be made by an authorized company representative and retained in company records for inspection for a period 5 years.

Who is responsible for the "Due Diligence Statement on Diamond Origin"?

The importer.

Is it sufficient to submit a signed 'Due Diligence Statement on Diamond Origin' when importing polished diamonds?

Each "Due Diligence Statement on Diamond Origin" must be supported by documentary evidence, demonstrating that it went through a reasonable, risk-based verification process to ensure that the goods are non-Russian. The importer should be able to provide documentary evidence, processes, or practices implemented, proving all reasonable efforts have been done to verify the non-Russian origin.

Importers should be able to present the following during a spot check upon request:

- One or multiple G7 or GF declarations, where applicable, may serve as strong proof of non-Russian origin. This needs to refer to the polished that comes from the certified rough, as this is a mandate for polished diamonds.

- If such declarations are not available, one or multiple valid Kimberley Process (KP) Certificates (single origin or mixed origin with the countries of mining origin clearly listed) may be presented. This needs to refer to the polished that comes from the certified rough, as this is a mandate for polished diamonds.

- Supporting commercial and transport documentation, demonstrating consistency with the declared origin, may also be used, such as:

    - invoices,
    - pro-forma invoices or consignment notes;
    - customs import and export declarations;
    - packing lists and transport documents (e.g. airway bills);
    - laboratory grading reports, where available.

- Documentary evidence derived from commercial traceability systems or platforms, where available, may be presented as complementary evidence.

- Evidence derived from your ERP / Stock Management System (e.g. Excel) which refers to the country of Mining Origin and can be linked back to written proof (e.g. Email) from or to your supplier with this information.

The above list is non-exhaustive. Authorities will assess the credibility and consistency of the documentation on a case-by-case and risk-based basis, taking into account the information reasonably available to the operator at the time of importation.

Importers should take reasonable and proportionate steps, based on available information, to prove the non-Russian origin of the diamonds, which may include:

- Identifying and knowing their counterparties, where appropriate; reviewing the Kimberley Process Certificates and/or G7/GF declarations accompanying the shipment;
- Checking consistency between the declared origin, trade routes and supporting documentation;
- Taking steps to avoid aggregation of traceable diamonds with goods of unknown or restricted origin;
- Applying segregation or handling measures where necessary to preserve traceability;
- Conducting risk-based internal checks proportionate to company size and operational complexity; carrying out visual or physical verification checks where appropriate and feasible.
- Where available, operators may use a traceability mechanism or digital ERP system, although this is not mandatory at this time.
- These measures reflect a **best-effort obligation** and are assessed on a **case-by-case and proportional basis**.

It is the importer's responsibility to ensure the documentation meets all the information requirements. As an illustrative, non-exhaustive list, please consider the examples below for documentation purposes.

For NATURAL ROUGH DIAMONDS:

- Diamond Office Template – G7/GF Declaration- Document
- Date-stamped KP certificate or G7
- Date-stamped customs declaration forms
- Invoice
- Packing list
- Date-stamped Transport documentation
- Optional: Evidence from traceability systems

For NATURAL POLISHED DIAMONDS:

- NEW: "Due Diligence Statement on Diamond Origin"
- Date-stamped customs declaration form
- Invoice
- Date-stamped Transport documentation
- Packing list
- Laboratory Grading Report
- Optional: Evidence from traceability or ERP systems, proof of reasonable and proportionate steps taken

For NATURAL POLISHED DIAMONDS - (to be) GRANDFATHERED:

- Diamond Office Template – G7/GF Declaration- Document
- Date-stamped customs declaration form
- Invoice
- Date-stamped Transport documentation
- Packing list
- Laboratory Grading Report
- Optional: Evidence from traceability systems

For SYNTHETIC ROUGH or POLISHED DIAMONDS:

- Diamond Office Template – G7/GF Declaration- Document
- Date-stamped customs declaration form
- Invoice
- Packing list
- Date-stamped Transport documentation
- Option for polished: Laboratory Grading Report
- Optional: Evidence from traceability system