

# GF Guidelines

## A guide to Diamond Office Grandfathering Procedures

CHEAT SHEET



Q1: WERE THE GOODS IN QUESTION ALREADY IN YOUR POSSESSION BEFORE JANUARY 1, 2024?

If YES, HEAD TO Q2.  
If NO, THEN CHECK IF OTHER GUIDELINES APPLY (G7, IN OR OUT OF SCOPE) OR TRADING AS USUAL/

Q2: DO YOU KNOW THE ORIGIN OF YOUR GOODS?

IF YOU DO, AND THEY ARE NOT RUSSIAN, THEN THESE CAN BE TRADED AS USUAL (GRANDFATHERING NOT REQUIRED)

IF YOU DO, AND THEY ARE RUSSIAN, THE GOODS WILL NEED TO BE GRANDFATHERED

IF YOU DON'T, THE GOODS WILL NEED TO BE GRANDFATHERED.

Are the non-industrial rough or polished, natural or synthetic diamonds, of unknown origin or of Russian origin you wish to "grandfather" imported before:

When we refer to "Grandfathered goods" (GF), we mean non-industrial diamonds - both rough and polished - natural or synthetic, of unknown or Russian origin that were already in someone's possession before a certain date relative to the implementation of sanctions, adopted by the G7 and the EU on January 1st, 2024.

REMINDER! BOTH SYNTHETIC/LAB-GROWN AND NATURAL DIAMONDS CAN BE GRANDFATHERED

- January 1st, 2024, start of the direct ban in case of direct imports of rough or polished diamonds from Russia
- March 1st, 2024, start of the indirect ban for natural rough and polished goods of Russian or unknown origin larger or equal than 1ct
- September 1st, 2024, the second stage of the indirect ban for natural & synthetic rough and polished goods of Russian or unknown origin larger or equal than 0.50ct

**FORBIDDEN**  
The shipment is not allowed to enter the EU, and the goods will be confiscated if they are presented for import.  
**BEWARE**  
Violating or circumventing sanctions is considered a punishable criminal offense which can carry prison sentences and or fines

Are you a Belgian Registered Diamond Company?

Do you want to trade with diamonds that were in your possession before January 1st, 2024.  
Non-BE Entity → Belgian Registered Diamond Company

Have you submitted your FPS mandated stock declaration? (31 December 2023)

If you:  
1. Submit your stock declaration at a later date  
OR  
2. Your stock held outside Belgium  
Follow Mechanism B

Can you prove ownership through documentary evidence?

**FORBIDDEN**  
The shipment is not allowed to enter the EU, and the goods will be confiscated if they are presented for import.  
**BEWARE**  
Violating or circumventing sanctions is considered a punishable criminal offense which can carry prison sentences and or fines

MECHANISM A IS EXPORT-BASED

Mechanism A Applies

!! EXCEPTION: IF YOU DID NOT DECLARE YOUR STOCK (31 DECEMBER 2023) THEN MECHANISM B APPLIES FOR YOUR EXPORTS AS WELL..

- You can freely trade with these goods as long as you follow these guidelines
- National Trading  
BE to BE
- Intra-EU Trading  
BE to EU
- International Trading  
BE to Outside EU

WHO DO I NEED TO EMAIL?  
DIAMOND OFFICE GRANDFATHERING DEPARTMENT: [DOGF@AWDC.BE](mailto:DOGF@AWDC.BE)

- Inform the Diamond Office by email (use the template)
- If no GF-number is required; inform the Diamond Office by email (use the template)
- If a GF-number is required; Pass through the Diamond Office, inform Diamond Office of GF status, receive a GF-number. *This is possible for both personal transport & shipment goods. Usual shipping documents also required.*
- Goods pass through the Diamond Office, inform Diamond Office of GF status, a GF-number is issued. *Must include the GF Declaration. Usual export documents also required.*

MECHANISM B IS IMPORT-BASED

Mechanism B Applies

!! EXCEPTION: IF YOU DID NOT DECLARE YOUR STOCK (31 DECEMBER 2023) THEN MECHANISM B APPLIES FOR YOUR EXPORTS AS WELL..

Does your shipment concern:  
non-industrial rough or polished, natural or synthetic diamonds?

Where relevant, this declaration must be added:  
"I hereby declare that the non-industrial, natural, or synthetic diamonds in this shipment were part of my stock on 31 December 2023."

USE THE MANDATORY TEMPLATE, AND DETERMINE IF IT IS THE G7 OR GF DECLARATION THAT IS REQUIRED.

IMPORTANT - FOR DOCUMENTARY EVIDENCE:

ALL DOCUMENTS, EXCEPT EVIDENCE FROM A TRACEABILITY SYSTEM, ARE REQUIRED.

IF YOU CAN'T SUPPLY ALL, TRY AS MANY AS POSSIBLE TO STRENGTHEN YOUR CASE. THE "GRANDFATHERING" STATUS CAN BE DENIED IF THE EVIDENCE IS NOT STRONG ENOUGH.

Once a GF-number is issued, this stays with the goods even as ownership is transferred.

IT IS THE BUYERS' RESPONSIBILITY TO ENSURE THAT THEY HAVE THIS INFORMATION!

