

THE DECLARANT BRIEF

ISSUE 34 | 15 October 2026 | A five-minute EU border briefing

Armenia tariff relief now depends on the origin file

New Armenian preferences, 1,569 Russia listings, registered PVA imports and the deadlines that need an evidence check.

A five-minute briefing for European importers, customs teams and trade leaders.

THE CRITICAL DEVELOPMENT

A lower tariff is only useful when the origin proof survives review

The EU's temporary trade-liberalisation measures for Armenia entered into force on 10 October. They remove ad valorem import duties from a broad list of originating goods and open duty-free tariff quotas for eight agricultural product groups.

The measure applies until 11 October 2028. It is valuable, but it does not make every Armenian shipment automatically eligible. The goods must fall within the listed CN codes, satisfy the applicable origin rules and arrive with acceptable evidence of origin. Quota goods also need an available balance when the declaration is accepted.

The eight quota groups cover cucumbers and gherkins, grapes, certain pears, apricots, certain cherries, peaches and nectarines, plums and strawberries. The annual volumes differ by product. For the first, shortened quota period, availability runs from the measure's entry into force through 31 December 2026.

The regulation also allows an invoice declaration from an Armenian exporter registered in the EU's Registered Exporter system, subject to the detailed customs rules. That option can make the preference easier to claim, but only if the exporter, statement and goods line up. A supplier's Armenian address is not origin evidence by itself.

What to do this week

1. Map planned Armenian imports to the precise CN codes in Annex I or Annex II.
2. Separate products with an unrestricted suspension from products that depend on a tariff quota.
3. Confirm the origin rule before asking the supplier for evidence.
4. Check the invoice declaration wording, exporter identity and REX details where that route is used.
5. Record the quota order number and balance check for Annex II goods.
6. Keep a fallback duty calculation in case the origin proof or quota claim fails.

The commercial opportunity is real. So is the audit question: can the importer show why this product is Armenian, not simply why it was shipped from Armenia?

Primary source: [Regulation \(EU\) 2026/2269 on temporary trade-liberalisation measures for Armenia](#)

THREE CHANGES TO KNOW

1. The EU adds 1,569 Russia military-industrial listings

Status: Adopted on 12 October 2026

The Council has listed 826 Russian companies and 743 chief executives connected with Russia's military and industrial complex. The targeted companies supply components used in missiles, unmanned aircraft and other weapons systems, including electronics, semiconductors, communications equipment, radar, aviation systems, explosives, optics and navigation equipment.

Listed parties are subject to an asset freeze. EU operators must not make funds or economic resources available to them, directly or indirectly. The scale of the package makes a name-only rescreen inadequate. Existing customers, suppliers, beneficial owners, directors, payees and other connected parties need to be checked against the updated data.

Action: Run a full rescreen using stable identifiers where available. Escalate close matches and connected-party exposure before releasing goods, services or payment.

Primary source: [Council announcement and links to the legal acts](#)

2. Certain Sinopec PVA imports are now being registered

Status: Registration from 10 October 2026

Customs authorities must register imports of specified polyvinyl alcohols from China manufactured by two Sinopec Group companies. The product currently falls under CN code ex 3905 30 00, TARIC code 3905 30 00 91, within the viscosity and hydrolysis ranges set out in the regulation.

Registration does not impose a new duty rate today. It preserves the possibility of collecting anti-dumping duties later on registered imports if the reopened investigation supports that result. The Commission has not estimated the amount of any future liability. Registration expires nine months after the regulation entered into force.

Action: Identify affected purchase orders and declarations by producer, technical specification and TARIC code. Keep the customs record and consider a contingent-duty reserve rather than assuming today's rate is final.

Primary source: [Commission Implementing Regulation \(EU\) 2026/2245](#)

3. DPRK listings now reach Russian commercial links

Status: Adopted on 12 October 2026

The Council added three individuals and four entities under the EU's autonomous DPRK sanctions regime. The package includes parties connected with DPRK workers in Russia, industrial cooperation and shipments of refined petroleum products. Those listed face an asset freeze, a ban on making funds or economic resources available and, for individuals, an EU travel ban.

This is a useful reminder that screening cannot stop at the country named in the regime. A Russian customer, employer, property company, vessel or commercial partner can still be caught through a DPRK listing.

Action: Rescreen Russian counterparties and transport parties where DPRK workers, vessels, petroleum trade or joint projects may be present. Review indirect benefit as well as the named contracting party.

Primary source: [Council announcement and links to the DPRK legal acts](#)

DEADLINE AND RISK RADAR

By 1 November 2026: Product identifiers must reach the customs message

Product identifiers become mandatory for imported distance sales on 1 November. Test the full hand-off from the seller's catalogue through the platform or carrier feed to the customs declaration. A product identifier stored in a catalogue is not enough if it never reaches the required declaration field.

[Commission guidance on low-value imports and product identifiers](#)

CBAM: keep the quarter, installation and emissions basis together

The Q3 CBAM certificate price is EUR 82.32 per tonne of CO₂ equivalent. Certificate sales start in February 2027, but importers should already separate 2026 imports by quarter and connect each calculation to the declaration, producing installation and emissions basis.

[European Commission CBAM certificate price table](#)

30 December 2026: EUDR evidence needs an operational test

Large and medium operators, plus micro and small operators already covered by the EU Timber Regulation, are due to enter application on 30 December. Other micro and small operators follow on 30 June 2027. Test geolocation files, due-diligence statements and reference-number hand-offs with real supplier data.

[Commission EUDR implementation update](#)

PPWR: check today's importer records before planning for 2030

The Packaging and Packaging Waste Regulation has applied generally since 12 August. Importers should already know who owns producer registration, supplier evidence and packaging data, including the current PFAS restriction for food-contact packaging.

[Commission packaging update](#)

Tariffs and trade measures: check TARIC on the declaration date

The Armenian preference and PVA registration both show why a static tariff table is risky. Product code, origin, producer, quota position and declaration date can all change the result.

[EU TARIC consultation](#)

WORTH READING ELSEWHERE

The following pieces are third-party commentary, not primary legal sources.

- [This Month in EU Sanctions: September 2026](#), Jan Dunin-Wasowicz on Substack. A detailed specialist review of the compliance and case-law context that preceded this week's Russia listings. Check each legal point against the cited act.
- [This Week in Sanctions & Export Controls](#), Jeff Nielsen on Medium. An older but useful practitioner analysis of how expanding Russia measures reach non-Russian parties and supply chains. It is background, not a current statement of the law.

ONE QUESTION FOR YOUR CUSTOMS FILE

For one Armenian preference claim, can you show the CN code, origin rule, evidence of origin, exporter identity and quota check in one review trail?

If the answer depends only on the supplier's address, the preference file is not ready.

[Check one declaration free with The Declarant](#)

ABOUT THE DECLARANT

The Declarant helps European importers and customs teams check classification, origin, trade measures, CBAM, missing evidence and possible financial exposure before filing or review.

This briefing is general information, not legal or customs advice. Measures, rates and procedures can change. Confirm the current legal act, TARIC measure and applicable national procedure before acting.

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