Regulatory News Alerts & Updates

Regulatory Alert: Unilateral Measures Impacting Spain-Israel Trade

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What has happened?

By means of Royal Decree-Law 10/2025 of September 23, the Spanish Government has approved a number of measures impacting exports and imports: (1) from/to Israel; and (2) of items originating in Israel ("made in" Israel).

Among others, the measures consist of:

1. Prohibition to export or import dual-use or defense articles, with a policy of presumption of denial of authorizations and licenses.

The ban also entails the denial of transit authorizations for such items.

2. Prohibition of import into Spain of products originating from Israeli settlements in the Occupied Palestinian Territory, regardless of the country of export.

What does it mean to FedEx and customers?

- 1. FedEx shippers cannot tender for carriage items in scope of the prohibition:
 - The items in scope are listed in Royal Decree 679/2014, of 1 August, approving the Regulations for the control of foreign trade in defense material, other material and dual-use products and technologies.
 - All exports from Spain are in scope. For imports, it impacts all shipments exported from Israel and all items in scope originating in Israel ("made in"), regardless of the country of export.
 - All dual-use and defense articles items in scope of the prohibition will be held, and items without valid export authorizations will not be accepted for carriage and returned to the sender.

- 2. FedEx shippers cannot ship products originating (regardless of the country of export of the shipment and value of the goods) from Israeli settlements in the Occupied Palestinian Territory.
 - The Spanish Tax Agency will publish the list of locations and postal codes corresponding to the Israeli settlements in the Occupied Palestinian Territory, so that said Agency and economic operators may comply with the provisions of this article.
 - To-date, the list has not been published by Spanish Customs. An indication of which locations could be determined to be in scope can be the <u>list of non-eligible locations</u> published by the European Commission in the context of the exclusion of settlement goods from preferential treatment (in place since 2005).
 - Exporters (regardless of origin and value of the goods) must indicate on the invoice, along with the Israeli origin, the postal code, and the city where the goods originate.
 Failure to do so will result in a delay in clearance, as this information is essential for obtaining the release of the goods.
 - When completing the import declaration for goods originating in Israel (regardless of origin and value), the FedEx team must include the following codes in box 44 of the import declaration (DUA-H7):
 - 9023 Postal code of origin in Israel
 - 9024 City of origin in Israel

Failure to indicate this will automatically result in Import rejection.

References:

Royal Decree-Law 10/2025, of 23 September (Spanish text) https://www.boe.es/diario_boe/txt.php?id=BOE-A-2025-18831

Customs Notice: New import validations (Spanish text)

https://sede.agenciatributaria.gob.es/Sede/aduanas/novedades/2025/septiembre/24/nuevas-validaciones-importacion.html

Royal Decree 679/2014, of 1 August, approving the Regulations for the control of foreign trade in defense material, other material and dual-use products and technologies (Spanish text)

https://www.boe.es/eli/es/rd/2014/08/01/679/con

List of Non-Eligible Locations

https://taxation-customs.ec.europa.eu/document/download/7b0df9b7-cbdb-48aa-a98f-172ae9513336_en?filename=Settlements%20Zipcodes%20Final%20%28004%29.pdf%20

EU-Israel Technical Agreement

https://taxation-customs.ec.europa.eu/eu-israel-technical-arrangement_en