

Application of ICC trade finance rules in the context of the Middle East conflict

Guide

In light of the current developments in the Middle East and the concerns expressed by members of the International Chamber of Commerce (ICC) regarding possible implications for trade finance operations, this document, developed by the ICC Global Banking Commission, aims to recall existing guidance available under the ICC rule framework.

As of 8 April 2026, the reported impact of the conflict, which started on 28 February 2026, appears to relate primarily to geopolitical developments, potential exposure to sanctions regulations, insurance considerations, adjustments to shipping routes and the presentation and examination of documents required in documentary trade instruments.

Although such developments may affect the commercial environment in which trade transactions occur, they **do not alter the application of ICC rules** governing documentary trade instruments, such as UCP 600, URDG 758, URC 522, ISP98, and, where relevant, their electronic supplements.

Historically, ICC issues guidance at times when external events impact the document presentation and examination process itself.

For example, during the [COVID-19 pandemic](#) in 2020 and the [disruption to air transport caused by the Eyjafjallajökull volcanic eruption in 2010](#) practical challenges arose concerning the physical movement of documents, presentation deadlines and the ability of banks to receive, examine and process presentations under the applicable ICC rules.

Should the conflict affect bank operations or documentary presentation under ICC rules, the following provisions within the existing ICC framework may become relevant.

Firstly, ICC rules already address situations where documents are delayed or lost in transit between banks. Provisions such as UCP 600 article 35, URDG 758 sub-article 28 (a), and URC 522 sub-article 14 (a) exempt banks from liability for the consequences arising from delay, loss or errors occurring in the transmission of documents or messages.

Secondly, ICC rules contain force majeure provisions that apply where the operations of a bank are interrupted by events beyond its control. These provisions operate only where the bank itself, due to such events, is unable to conduct business as it relates to acts of the kind covered in the relevant set of ICC rules. They do not apply merely because external geopolitical developments create commercial difficulty while the bank remains open and operational for such acts.

Accordingly, whilst ICC rules do not cover instances where a beneficiary or an applicant face an event amounting to force majeure under the applicable law that affects its business operations and any underlying contract that a LC or a guarantee may be supporting, the force majeure protection under the ICC rules is limited to interruptions affecting the bank's own operations.

Thirdly, where practical disruptions affect the presentation or examination process of documents, parties to a transaction may agree on alternative arrangements in lieu of the presentation of original hard copy documents, including the use of scanned or electronic copies or other agreed methods of presentation deemed to be practical in the circumstances.

Finally, in circumstances where parties wish to agree on electronic presentation, they may consider referring to the eUCP or eURC supplements, which provide additional rules governing electronic records where these are expressly incorporated into the credit or collection instruction. The URDG already provide for the necessary rules for electronic documents and require the incorporation of no further supplements.

ICC, through its Global Banking Commission, will continue to monitor developments closely. Should circumstances arise that materially affect the presentation, examination, or processing of documents under ICC rules, including widespread disruption to courier services, closure of presentation locations, or other operational constraints, further guidance may be considered.

In the meantime, ICC encourages everyone to **continue applying the relevant ICC rules in the usual manner.**

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The International Chamber of Commerce (ICC) is the institutional representative of more than 45 million companies in over 170 countries. ICC's core mission is to make business work for everyone, every day, everywhere. Through a unique mix of advocacy, solutions and standard setting, we promote international trade, responsible business conduct and a global approach to regulation, in addition to providing market-leading dispute resolution services. Our members include many of the world's leading companies, SMEs, business associations and local chambers of commerce.



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