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on

"Bridging the gap": Analysis of China's export controls against international standards

by

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I. Brief background on Chinese export controls

From the mid-to-late 1990s, China began to take a number of important steps to govern and limit the export of sensitive military-related products, chemicals, biological agents, and missile-related technologies. This was a stark contrast to the early 1980s, where its export controls on sensitive WMD-related goods and technologies were weak and inadequate. Continued international pressure, a growing normative consensus on curbing the illicit trade of WMD-related products, and an increasing concern with its own international reputation and standing in the international community all helped contributed to the Chinese government's decision to improve its export control regulations and practices. These measures were reflected in the issuance of domestic decrees and regulations, the revamping of administrative structures related to non-proliferation and arms control, and Chinese officials' growing recognition of the importance of multilateral, regional, as well as bilateral commitments.

At the same time, many concerns persist about China's current and longer-term policies and priorities, particularly in the realm of export controls, and how they might contrast with broader interests of the international community. In some instances, notwithstanding Beijing's decision to take steps domestically to come to closer adherence to certain international norms and standards, it remains outside of these regimes. For example, in 2002, China has introduced export control regulations that are reportedly roughly parallel to the strictures on missile-related exports within the Missile Technology Control Regime (MTCR); it applied for admission to the regime but has yet to be formally invited. In 1998, China's expansion of its chemical control list was meant to signal its commitment to tighten export controls on dual-use chemicals, but China remains outside the Australia Group. Likewise, while China has indicated that it will curb and more strictly monitor dual-use gods and technologies, it does not belong to any international grouping of like-minded states seeking to limit conventional arms sales such as the Wassenaar Arrangement.

At critical stake here is the widening gap in the international community's understanding and analysis of China's evolving export controls. There remains a dearth of updated and comprehensive assessment of the Chinese government's complex and often opaque decision-making structure related to export controls, the export control lists and regulations, and how they compare with internationally accepted standards as benchmarked by such regimes as the MTCR, Australia Group, and the Wassenaar Arrangement. Many of these export control lists and regulations remain available in the Chinese language, with limited or summarized versions in English translations. To fully explore what future prospects for China's entry into the export control regimes, it is important to gain a clearer understanding and analysis of the scope and scale of its current export control mechanisms and capabilities.

The Foreign Office's counter-proliferation program lays out a series of important near- and long-term objectives that underscores the need to reduce the global threat of weapons proliferation. Given these important stakes, this project has sought to further strengthen our understanding of China's evolving approach to export controls, with a

particular focus on how to more effectively engage and enlist China's support and adherence to export controls regimes that it currently remains outside of—the MTCR, Australia Group, and Wassenaar Arrangement—and to help identify future prospects for achieving concrete, near-term progress in strengthening China's export controls commitments.

II. Overview of Chinese export control decision-making processes

Beginning in the 1990s, China has gradually created a legally based system for export controls on munitions, military products, and other sensitive, dual-use goods and technologies. An important part of this process has involved the issuance and promulgation of national regulations that have helped to institutionalize China's international, multilateral and bilateral nonproliferation commitments. In so doing, Chinese officials have been learning and incorporating from other countries' export control policies and incorporating many of the international standards for nonproliferation export controls including: a registration and licensing system; control lists of equipment, materials, and technologies; end-user and end-use certifications; catch-all principles; customs supervision; and punishments and penalties for violations of export control policies and regulations.

It is important to note that China's export control policy is not unlike that of other countries, including many Western industrialized countries. Effective export controls take place by limiting the sales of weapons and the related components and materials, and gradually expanding to include a wider range of dual-use goods and technologies. The actual implementation and enforcement of national export control policies usually lag behind declared policies. In the process of developing export control policies, violations of international standards and regime guidelines can be common, and pressuring proliferators to cooperate and abide by widely accepted international norms when doing so is not in their material power or economic interests takes time and continued dialogue. China's export control policies and practice in thus not unique, but it is at an earlier stage of development than the nonproliferation policies of the established members of international regimes.

The institutionalization of China's export control policies is filled with twists and turns and has taken decades to develop, but it is worth noting that the regulations all reflect key international export control standards and practices. The next major challenge for China is ensuring that these rules, regulations, practices, and decision-making standards are consistently implemented and enforced throughout the country. More important, it is critical that the relevant government agencies punish violators when deviations from the export control standards occur.

The legal foundation for export controls on sensitive goods in China is based largely on the *Foreign Trade Law*, promulgated in 1994. The law provides the state with the explicit power to regulate imports and exports and specifies how this will be done, making the processes more transparent and explicit for the first time. Under Articles 16 and 17 of the Foreign Trade Law, for example, the state can restrict or prohibit the import and export of goods for reasons of "safeguarding national security and public interests" and "under the international treaties or agreements signed or acceded to by the People's Republic of China"; Article 18 requires the creation of control lists; and Article 19 provides for licensing authority of items with "special requirements." These stipulations and control lists were then detailed in subsequent regulations that appeared in following years. This law was revised in 2004, and these changes have important implications for the functioning of China's export control.

The *Customs Law* is another important and major development related to export control in China. It establishes the legal basis of China's system of customs inspection and verification for import and export trade controls, and provided the foundation for which additional provisions allowed the government to pursue further legal basis for export controls and specifically for export control enforcement, including the *Administrative Punishments Law* and the *2001 Amendments to the Criminal Law.*

Additionally, there are several sets of regulations that further formalize and legalize China's export control system. For example, in December 2003, the Ministry of Commerce (MOFCOM) and Customs jointly issued a circular specifying the procedures for Customs examination of export certificates in Customs' clearance of sensitive items and technologies, where the obligations of exporters in meeting Customs' inspections requirements were outlined. Moreover, in January 2004, MOFCOM issued the *Provisional Measures on the Administration of the Export License on Sensitive Items and Technologies*, which specifies the procedures for companies involved in applying for and gaining authority to export sensitive, controlled goods. In 2004, MOFCOM and Customs also jointly issued a catalogue of sensitive goods that require an export license. The issuance of these new procedures and legal instruments is part of the government's effort to establish a firm legal basis for effective export control administration on sensitive goods and technologies. A more comprehensive list of export control and other export control-related laws and regulations are attached in the Appendix.

III. China's export controls on missiles and missile-related technologies and MTCR

China's export controls on dual-use, missile-related goods and technologies is one of the newest areas of development for export licensing. The international community has been pressing the Chinese government to develop clearer guidelines and regulations controlling the export of missiles, dual-use missile products and technologies. China was reluctant to take this step for years due to the linkages and finally issued the *Regulations on the Export Control of Missiles and Missile-related Items and Technologies*, a formal missile control regulation, and the *Missiles and Missile-related Items and Technologies Export Control List* in August 2002. The regulation includes catch-all provisions and states that exports can be halted and reversed if there is risk of proliferation. Interestingly, the regulations also specify that items not listed in the control list can be subject to control and are a vast improvement from the first missile nonproliferation pledges that China adopted in the early 1990s. The following is a summary and overview of the application and licensing review process for missiles and dual-use missile-related goods and technologies:

1. A registered Chinese exporter submits an application for export of a controlled item to MOFCOM. The application must include the standard set of certifications and documents.

2. MOFCOM will review the application within 45 days. MOFCOM can also review it in conjunction with the State Council and Central Military Commission (CMC). MOFCOM can consult with the Ministry of Foreign Affairs (MFA) and the military depending on the nature of the export and the recipient.

3. If the export entails significant impact on China's national security interests or its social and public interests, then the application is submitted directly to the State Council and CMC for further review.

4. When the application is approved, an export license is issued by MOFCOM. MOFCOM will also notify Customs after issuing the license.

5. The exporter presents the license to Customs. After Customs inspection and verification, the export can proceed. Any change to the original application will require another full review through MOFCOM.

The export control policies and procedures currently in place is a stark contrast from China's past practices with missile exports. In the 1980s, for example, China developed the "M" class of short-range ballistic missiles for export and was a major proliferator with little to no regard for international export control standards and regimes. Most notably, such sales included transfers of M-11 missiles and technology to Pakistan, M-9 missiles and technology to Syria, and DF-3 missiles to Saudi Arabia. It has also been reported that China has provided sensitive missile technology in the past to Iran, Iraq, Libya, and North Korea. It originally saw MTCR as a discriminatory measure established by an elitist group of developed, Western states

that continued to sell other delivery systems such as combat aircraft while restricting sales of ballistic missiles, in which developing countries such as China had invested heavily.

However, in the 1990s China's views on missile nonproliferation slowly began to change. In part to mounting global concerns about missile proliferation and the increasing pressure brought about by international sanctions on Chinese companies, China pledged to abide by MTCR guidelines. China had agreed on November 2000 not to help states develop ballistic missiles that can be used to deliver nuclear weapons. It defined such missiles as those capable of carrying a 500-kilogram payload at least 300 kilometers, guidelines that mirror those in MTCR. Subsequently, the 2002 regulations mentioned above appeared to demonstrate China's willingness to follow international norms. The 2002 regulations and control list were relatively comprehensive and in some fields are stricter than MTCR guidelines. The regulations also follow the MTCR's "presumption of denial" approach, requiring specific approval and an export license for exports to authorized end-users.

As the rotating chairperson of MTCR in 2002-2003, Mariusz Handzlik, the ambassador of Poland, invited China to participate in the regime. In turn, Hu Xiaodi, the Chinese ambassador for disarmament affairs, sent a formal letter in 2004 to MTCR indicating that China was ready to positively consider applying for joining the regime. Several rounds of MTCR-China joint dialogues were convened to discuss the prospects of China's membership. However, a number of MTCR member states, most notably the United States, have blocked China's entry into the suppliers' regime. The hesitation of some member states to admit China to the MTCR stems from the continued anxiety about China's unwillingness or inability to fully implement and enforce the national export control laws.

There is a general sense that China remains committed to joining the international standards on export control, but MTCR remains a looming hurdle. The rejection of China's 2004 application has been a frustrating process for both sides, and in particular, Chinese officials express a sense of irony that Beijing's gesture of goodwill to apply for and sign up to the regime has not been reciprocated. Since 2004, China's export control lists have also broadened to include and reflect most of the standards upheld by the international regimes and agreements, and in private, Chinese policy elites acknowledge the issue of domestic enforcement of regulations and export control lists. However, it appears that MTCR-China dialogue for membership remains stalled.

In the meantime, China continues to develop such new missile technologies as highly accurate cruise missiles and anti-ship ballistic missiles, as well as to modernize its existing ballistic missile arsenal by introducing newer versions that have longer ranges, increased accuracy, and increased survivability. With continued modernization in its missile technology capabilities, Beijing has also taken on a growing interest in transferring and selling said technology and material to foreign governments. Notwithstanding the institutionalization of its export control legislation that aligns with MTCR guidelines, China remains outside the scope of the regime, and there are continued concerns with Chinese defense companies' continued desire to

proliferate sensitive missile-related technology, including to Iran and Pakistan.

IV. China, conventional military arms export, and the Wassenaar Arrangement

China's export control mechanisms for conventional arms began with the establishment of the *Regulations of the PRC on the Administration of Arms Exports*, promulgated by the State Council and the Central Military Commission in October 1997 and subsequently amended in 2002 with the promulgation of the *Administrative List of Export of Military Products*, which lists for the first time the specific military goods controlled under the regulations. The Regulations cover the scope and parameters of military products, decision-making structure, and management procedures for export controls.

The export control list for military products is comprised of 14 categories of defense items that are subject to the licensing requirement and includes the following:

1. Light weapons;
2. Artillery and other launching devices;
3. Ammunition, landmines, aquatic mines, bombs, anti-tank missiles and other explosive devices;
4. Tanks, armored cars and other military vehicles;
5. Military engineering equipment and facilities;
6. Military vessels and their special equipment and facilities;
7. Military aircrafts and their special equipment and facilities;
8. Rockets, missiles, military satellites and their auxiliary facilities;
9. Electronic products for military purposes and devices for fire control, range finding, optics, guiding and controlling;
10. Explosives, boosters, incendiary agents and the related compounds;
11. Training aids;
12. Protective equipment and facilities against nuclear, biological and chemical weapons attacks;
13. Logistic equipment, military supply and other auxiliary equipment; and
14. Other products.

This list of conventional arms is more detailed than the seven major categories of conventional arms that are included in the UN Register of Conventional Arms, and it also covers the munitions list of the Wassenaar Arrangement. Additionally, in an effort to better integrate international standards on military *and* dual-use goods into China's existing export control legislation, the State Council issued in November 1998 export control regulations covering 183 dual-use technologies. In 2002, an amendment was made to the regulations that covered parts of the Wassenaar Arrangement's core list of dual-use goods and technologies. In 2009, MOFCOM and Customs jointly issued the *Index of Management of Import and Export Permits of Dual-Use Items and Technologies*, which came into effect on January 2010 and covers nuclear, biological, chemical, and missile-related dual-use goods. Chinese officials have indicated that a new export control list for dual-use goods and technologies is currently being developed and will be released by MOFCOM in late 2012.

The following is a summary and overview of the application and licensing review process for conventional arms and military products exports:

1. An authorized arms-trading company (see official list below) submits proposals for arms exports in the form of an application for examination to the State Administration of Science, Technology and Industry of National Defense (SASTIND).
    - China Electronics Import and Export Company;
    - China Aeronautical Technology Import and Export Company;
    - China North Industries Company (NORINCO);
    - China Vessels Industry Trading Company;
    - China Precision Machines Import and Export Company;
    - Poly Science and Technology Company;
    - China Xinxing Import and Export Company;
    - China Jing An Import and Export Company;
    - China Electro-Sci-Tec International Trading Company;
    - China Vessels Heavy Industry International Trading Company; and
    - Aerospace Long March International Trading Company.

2. The proposals are reviewed and approved or rejected by SASTIND, in joint consultation with CMC and MFA. In addition, when the item to be exported could affect China's own military capability, the PLA General Armaments Department (GAD) is consulted to assess the impact on China's national security interests and foreign policy.

3. Once the proposal is approved, the export program proceeds and the company can finalize the sales contract. A contract for arms export shall become effective only after it is approved by SASTIND. When the Chinese company files the application with the contract, valid certification documents from the recipient country are necessary such as the end-use certificate.

4. Before exporting military products, an arms trading company shall apply to SASTIND for an arms export license on the basis of the approval document for the arms export contract.

5. Customs shall examine the license and give clearance for the export to proceed.

6. In recent years, there have been more instances of internal disagreements on how to best proceed with a number of major controversial, conventional arms deals. When such a stalemate occurs, the case is sent up the hierarchical chain and the State Council and CMC have the final say. Interestingly, the military does not necessarily win the debate at the end of the day; as in the "ship of shame" incident with Zimbabwe in 2008, for example, the final decision was to rescind and cancel the deal.

In sum, China's export control policies on conventional arms are by and large

consistent with those of the Wassenaar Arrangement. Nonetheless there are some hurdles in getting China on board the Wassenaar Arrangement. As discussed earlier, the export control mechanisms China has put in place, along with the export control list, is almost identical to the munitions list of the Wassenaar Arrangement. More important, however, is the need for an export control list for dual-use goods and technologies, which is covered under MOFCOM's jurisdiction. An updated and more comprehensive list needs to cover the core list of the Wassenaar Arrangement for dual-use goods and technologies. Second, there is a general sense among Chinese policy elites that until China gains admission to MTCR, the prospect for China to sign on to the Wassenaar Arrangement remains slim. In private, Chinese officials point to the fact that its export control policies for conventional arms are more or less aligned with the existing international arrangements and there is little to gain from being part of the Wassenaar Arrangement. The past experience with its failed attempt to join MTCR continues to be a source of concern and frustration and prevents Chinese decision-makers from further considering whether or not to apply to be part of the Wassenaar multilateral export regime.

V. China, chemical weapons export control, and the Australia Group

China's controls on chemical weapons-related equipment, materials, and technologies were some of the first export control regulations adopted by the Chinese government. These regulations were part of China's effort to prepare for its 1996 ratification of the Chemical Weapons Convention (CWC). Since then, the government bureaucracy has changed, and China has increased the scope of its controls on chemical weapons-related items. This has resulted in a two-tiered system of controls on chemical weapons-related items. The first tier comprises the Chemical Weapons Convention Implementation Office (CWCIO), which serves as the main point of contact for exports of CWC-controlled chemicals plus the ten dual-use chemicals added in 1998. The second tier is MOFCOM, which serves as the main point of contact for exports of dual-use chemical weapons-related equipment and technology and the chemicals and related equipment that China added in 2002. Thus, the licensing authority for chemical weapons goods and technologies is essentially split, but they mirror image one another.

The legal basis for these controls rests on four legal documents, including the *Regulations on Monitored and Controlled Chemicals* of 1995; the 1997 *Implementation Details on the Regulations on Monitored and Controlled Chemicals* ; the 1997 *Circular on Further Strengthening Supervision over the Import and Export of Chemical Materials That Can Be Used in the Production of Chemical Weapons*; and the *Decree No.1 of the State Petroleum and Chemical Industry Administration: Inventory of Newly Added Varieties That Are Listed as Schedule Three Controlled Chemicals*.

The following is a summary and overview of the application and licensing review process for chemical weapons:

1. A registered Chinese entity submits to the CWCIO a license application for the export of controlled chemicals from the CWC list or from the ten chemicals added to Chinese control lists in June 1998. The exporter must submit the standard set of required documents and certifications to complete the application.

2. CWCIO reviews the application. If the application involves the export of CWC Schedule One or Schedule Two controlled chemicals, then the CWCIO forwards the application to the State Council for final approval. In practical terms, this latter step seldom occurs. Schedule One chemicals are actual chemical weapons. The CWCIO is more involved in reviewing license applications for CWC Schedule Three chemicals, which are dual-use chemicals. In reviewing the application, the CWCIO can consult with MOFCOM and the MFA depending on the nature of the export and whether it raises issues having an impact on Chinese national security or foreign policy interests. An intranet was established between the CWCIO and MOFCOM that allows joint review of such applications.

3. If approved, MOFCOM's Licensing Bureau issues the license and notification

of the approval is sent to Customs.

4. The license is given to Customs. After inspection and verification, Customs allows the export to occur. Any change to the original application will require another full review.

In spite of the export control policies on chemical weapons, China is not a member of the Australia Group (AG), the international export control regime focused on chemical and biological weapons. However, Chinese officials report that since 2006 Beijing has held regular consultations with the AG, and China's chemical weapons-related export controls are in line with AG control lists.

The main issue for China's chemical weapons export control is the effective monitoring and enforcement of the regulations. China's chemical industry is large and diffuse, representing a core industry in China's overall economic development. According to the March 2008 report to the CWC Second Review Conference, "the total number of declared and inspectable industrial facilities in China are 1,855 and 1,737 respectively, which account for approximately one third of the total numbers of declared facilities of all States Parties." This has made domestic enforcement of export control laws much more difficult, resulting in inconsistent implementation.

VI. Implementation and Enforcement Challenges

China's export controls can be evaluated on the degree to which they are implemented and enforced. Implementation involves China's effort to implement government policy within the Chinese government and between government and defense industry. Enforcement, on the other hand, involves the monitoring of the behavior of government entities and defense industry, identifying violations by these entities and companies and, most important, holding them accountable for violating the established export control policies and regulations.

Since the 1990s, Beijing has taken several steps to improve implementation of its export controls, which includes the establishment and standardizing of national laws and regulations. The government has established a process of formal interagency coordination to vet possible exports of WMD-related goods and technologies making the processes for decision-making more transparent. And, since late 2003, the government has identified detailed policy standards that are used in determining whether to license a sensitive export. More specifically, a critical step in increasing the efficiency of its implementation effort is to better inform, educate, and train both government officials (e.g., especially Customs, SASTIND, and MOFCOM officials, bureaucrats, and technocrats involved in the day-to-day processing of data, licenses, and review of export control applications) and Chinese defense companies' entrepreneurs about export control obligations and responsibilities.

Enforcement remains a perennial weakness in China's export controls. The government's capacity to detect, catch, investigate, and penalize export control violators is significantly underdeveloped. Critical gaps exist in many aspects of export control enforcement, especially monitoring, interdiction, and penalization. Continuing weaknesses in China's ability to investigate export control violations include SASTIND, MOFCOM, and Custom's lack of experience in this area. In particular, their attitude in approaching such investigations shows a weakness in their investigative capabilities. Their approach is often reactive, relying on the provision of intelligence data by the United States, the United Kingdom, and/or the European Union.

Chinese officials also appear be unwilling to pursue investigations against large and influential Chinese state-owned enterprises. As of 2012, there have only been four to five publicly made cases of government penalization for export control violations. Although Beijing has improved its export control system, it remains difficult to fully assess China's ability to enforce its controls since Chinese authorities have been hesitant to discuss cases of export violations. The limited number of cases that Chinese authorities have made public show that Beijing still has problems with the activities of small and medium-sized enterprises, and with the domestic gathering of useful intelligence on possible violations. Chinese officials have indicated that they will step up the enforcement of export controls, including the latest case in point where two Chinese companies were sanctioned for engaging in preliminary contacts on arms deals with the Libyan government in 2011.

VII. Policy Implications and Recommendations

This report provides a brief synopsis and analysis of Chinese export controls, the decision-making processes, and their complementarities/differences with international standards and regimes, particularly MTCR, Wassenaar Arrangement, and the Australia Group.

Going forward, it is clearly in the interests of the international community, particularly member states of these international export control regimes, as well as civil society and non-governmental actors, to deepen and sustain the encouraging trends Chinese officials have taken with regards to aligning their national export control regulations to the guidelines established by the international regimes, while moderating and hopefully changing China's residual reluctance and cautiousness in a more positive direction.

An effective strategy thus needs to respond to China's emergence in a way that assures regional and global stability and increasingly integrates the country as a partner, or at least not an outlier, in achieving a safer and more secure world free from illicit trade of weapons of mass destruction. To uphold and sustain these important norms and to have an effective global conventional arms regime, key stakeholders in the international community should continue to strengthen measures which encourage China to become a more responsible actor in international affairs. In doing so, however, external observers should be cognizant of the constraints on such international influence, but not allow that to become an excuse for inaction.

Several key points are worth keeping in mind, particularly when occasional frustrations are bound to occur in engaging with Chinese counterparts. First, where an international consensus on a particular issue is clear, Beijing has tended to become more supportive of or acquiesce to it, rather than being an active opponent and spoiler. By and large, Beijing does not wish to be seen as an outlier on critical global and regional issues as it is increasingly concerned with its image, status, reputation—factors that are at times far more important and critical than material power or economic priorities. Hence, an important part of gaining China's cooperation as supportive actor and member of MTCR, the Wassenaar Arrangement, and the Australia Group will continue to depend in the future on such key actors as the member states and global civil society to forge broader international support to shape and influence Chinese policies in a positive direction. Soliciting support and membership from additional members from the developing South would help broaden the regimes' diversity and representativeness, and help to convince China that membership is not exclusively reserved for advanced, industrialized economies.

Likewise, a critical first step would be to continue and sustain the MTCR-China dialogue, acknowledge Chinese improvements in its export control policies on missiles and missile-related technologies, and identify ways in which capacity-building programmatic activities and workshops can help inform, educate, and train both government officials (e.g., especially Customs, SASTIND, and MOFCOM officials, bureaucrats, and technocrats involved in the day-to-day processing of data,

licenses, and review of export control applications) and Chinese defense companies' entrepreneurs about export control obligations and responsibilities.

Second, there is also a need to understand that Beijing's choices to take more positive measures on signing on to full membership will first and foremost derive from its own realization that it is in Chinese interests to do so. Hence, an effective strategy must make a convincing case that China's commitment to becoming a more responsible stakeholder is not only in the interests of the international community, but is equally or even more so in China's interests. This appears to be China's understanding as it recognizes the value of multilateral security and confidence-building measures, where it conforms to regional and global norms and takes measured steps to convince others and demonstrate its beliefs of supportive and constructive intentions. To be sure, on conventional arms transfers, dual-use goods and technologies, and missile-related components, there remains plenty of work ahead to convince China to sign on this global agenda, most probably so because committing to the export control regimes means that it will be expected to in some way shape or form support and promote a degree of good governance and transparency. Moreover, there are conservative and nationalist voices at home that have strong ties with and interests to shield the Chinese defense industries and will continue to harbor skeptical views of such restrictive export control regimes. How Chinese decision-makers balance and reconcile these conflicting interests is thus critical and merits continued observation and sustained engagement with a broadening range of Chinese policy elites on WMD-export control issues.

And third, there remains a degree of cautious optimism for more consistent Chinese implementation and enforcement of national export control regulations. Much of this can be gleaned from the domestic decision-making dynamics within China in the last decade and a half. As discussed earlier, the decision-making structure remains problematic. The broader takeaway then is that the Chinese decision-makers are pragmatic; they know when to pull the plug on problematic arms deals and when to deflect international criticisms. As such, at this early and uncertain stage of the debate, the decision-making process seems to approach arms deals on a case-by-case basis. The observation that the conservative and militarist arm of the decision-making circles does not necessarily always win at the end of the day, and the fact that the Chinese position on export controls is far from being set in stone in one direction or another bears a degree of good news for external observers.

As such, current member states of the international export control regimes should therefore devote the time and resources within the policymaking process to research, understand, and recognize what has worked in the past in the broader non-proliferation and arms control regimes (e.g., the Nuclear Suppliers Group and Zangger Committee), what has not, and what is likely to work in the future in drawing China closer to assuming even more the role of a responsible stakeholder by joining MTCR, Wassenaar Arrangement, and the Australia Group. It will undoubtedly require a greater openness on the international community's part to recognize, appreciate, and, where necessary and possible, make changes that are more receptive to developing countries' as well as Chinese concerns and interests.