



# Ministry of Defence

## MOD Form 680 (F680) Policy and Guidance for UK Companies and UK Government Departments – August 2024

### Frequently Asked Questions

This document is in two parts. Part one covers the F680 process in its entirety. Part two covers those frequently asked questions relating to the ITAR elements of the F680 process.

## PART ONE

### **What makes a good F680 application?**

A good application sets out in detail what the intent of releasing the information is and what the potential is for any future activity related to the prospective export. The UK MOD can only assess an application if the information given is complete. Typically, you should set out exactly what you intend to release, to whom and for what specific reason.

If the release of material is part of a longer-term objective, for example looking forward in the future to support a developing project which might include an element of industrialisation then you must tell us about that. You should also supply any brochures, technical data, project plans or other material which explain what you are looking to achieve. In short, tell the story as you know it.

[Contact the Export Control Joint Unit MOD \(ECJU MOD\) Team](#) if you are unsure about how to submit a F680 application or what to include in it.

Ensure the information or equipment has been security graded by the relevant Government authority before submitting a F680.

Answer the questions contained within the F680 application form as fully as possible.

Submit applications at the earliest possible date. If additional information is requested, please respond promptly.

Reference any related previous F680 applications or approvals in a new application, for example for the same type of equipment.

### **What is meant by 'release'? Does release mean export?**

'Release' does not necessarily have to mean export. A release of classified information can occur without it crossing any physical borders. For example, discussing or demonstrating classified information or equipment with a foreign entity in the UK would count as a 'release' but not necessarily an export. Furthermore, information and equipment that is considered classified, may not always be export controlled.

### **What is meant by 'classified'?**

'Classified' means that the information or equipment has been assessed by MOD and deemed to have a security classification. If you have a contract with the MOD, the classification will be in the Security Aspects Letter (SAL) relating to your contract. If you have developed the information or equipment independently it is considered 'Private Venture' and may require an assessment of its classification by the MOD Directorate of Security and Resilience (DSR).

The classifications that information or equipment may be given are OFFICIAL (including OFFICIAL-SENSITIVE), SECRET or TOP SECRET. When you apply for a F680, you will be asked to provide the classification of the equipment or information and details of the MOD Authority who assigned the classification.

### **What is meant by 'a foreign entity'?**

By a 'foreign entity' we mean a non-UK Government, organisation, company or person.

### **Is the F680 requirement dependant on goods being Military-Rated or Dual-Use?**

No. The Strategic Controls Lists rating of an item is not a consideration in relation to the F680 procedure. The F680 procedure is equally applicable to Military and Dual-

Use equipment graded OFFICIAL-SENSITIVE and above. [You can view further information on export controls related to Dual-Use equipment here.](#)

**Do I need a F680 if I want to undertake promotion or demonstration at OFFICIAL of items graded OFFICIAL-SENSITIVE or above to a foreign entity?**

Yes.

**Do I need F680 approval to show my goods at an exhibition?**

No. To do this you need an Exhibition Clearance from the relevant HMG Authority.

**Do I need F680 approval in place in order to obtain UK Defence and Security Exports (part of the Department for Business and Trade) support for an export campaign?**

No. When you make an application you will have the opportunity to agree to ECJU MOD Team supplying DSE with information about your application if you are considering requesting support for your export. DSE will not release F680 data to non-UK Government third parties.

**Do I need F680 approval to sub-contract MOD classified work with foreign companies?**

No, but you will need to complete an application to sub-contract or collaborate with an overseas supplier on work involving OFFICIAL-SENSITIVE and above classified information (also known as F1686).

**Do I need F680 approval to send OFFICIAL-SENSITIVE or above information or equipment to an overseas foreign subsidiary?**

Yes.

**Do I need F680 approval to send Unclassified ITAR material to an overseas foreign subsidiary?**

Yes.

### **How do I apply?**

You can apply for a MOD Form 680 using the [online export licensing system, SPIRE](#).

### **Do I have to pay to apply?**

No.

### **How do I obtain help with using SPIRE to apply for a F680?**

Further guidance is available on SPIRE.

### **What if I need to apply for more than one destination?**

You can apply for up to 20 different destinations on a single application. When submitting multiple applications, destinations should where possible be grouped by geographical region. For F680 applications involving ITAR material, you should only include those destinations for which you have US Government approval, as inclusion of unapproved destinations will delay the response for all others.

### **Can I enter classified information onto the SPIRE system?**

Yes, you can input information up to and including OFFICIAL-SENSITIVE.

### **What should I do if I do not understand the provisos applied?**

You should contact your MOD Case Officer to discuss your queries or send an [e-mail to the ECJU MOD Team](#).

### **Once I have obtained F680 approval can I export the information or equipment approved for release?**

Not necessarily, as your equipment or information may also be export controlled. If this is the case an export licence must be obtained via SPIRE. Please note that the Department for Business and Trade is the export licensing authority.

[You can view further information on export controls here](#) or contact the [Department for Business and Trade export control helpdesk](#).

### **Which type of export licences require F680 approval?**

This policy requires that a company obtain F680 approval before releasing information equipment or information with a security grading of OFFICIAL-SENSITIVE or above to a foreign entity or that has been identified as ITAR controlled by the US Government. This is regardless of the type of export licence which may be used for goods or technology that are controlled. However, some Open General Export Licences (OGELs) include the F680 or F1686 as a condition for use of the OGEL.

### **If one of my Company's other UK sites already has a F680 approval for an activity do I need another approval or can I use theirs?**

You can use their approval as long as the equipment or information is the same and is being released to the same entity.

### **What happens if my Company changes name or is merged with another Company?**

In this case, please contact MOD with details of the merger or change of the company name. MOD will then consider issuing a letter confirming that existing F680 approvals for your former company name are still valid.

### **Where can I get further assistance in completing a F680?**

When you first apply for a F680 you will be assigned a dedicated MOD Desk Officer who will work with you during the F680 process. You should contact your MOD Desk Officer in the first instance who will assist or put you in contact with someone else that may be able to assist further.

If you do not have a MOD Desk Officer allocated to you then [please contact the ECJU MOD Team for further information](#).

## PART TWO

FAQ's relating to the adaption of the F680 process to include ITAR material from the 16<sup>th</sup> August 2024

### **What changes have been made to the circumstances in which a company needs to obtain an F680?**

The existing requirement to obtain an F680 for the release of information, equipment or technology that has been given a security classification by the UK MOD is not affected by these changes.

UK Companies based in the UK who release unclassified ITAR controlled material to a foreign entity within or outside the UK, however, now need to apply for an F680.

### **Do these changes relate to classified ITAR material and/or unclassified ITAR material?**

Both. These changes apply to all ITAR material. UK companies will have been obligated to obtain an F680 for classified ITAR material (or any other internationally classified material) before these changes came into force. The F680 process will now capture those releases of unclassified ITAR material to a foreign entity within or outside the UK.

### **What information needs to be provided as part of an F680 application for ITAR material?**

MOD need to know what ITAR controlled information is going to what foreign entity in which country, i.e., the 'what', 'who', 'where'. We are providing exporters the freedom to choose how they present this and whether they apply on a programme, project, contract, capability or country level. For example, you may be involved in the Joint Strike Fighter Programme and wish to submit an overarching F680 covering all your ITAR material releases to all destinations for that specific activity.

The SPIRE application will therefore need to include:

- A description of the overall programme of work.
- The ITAR approval reference(s).
- The scope of those ITAR approvals.
- The USML categories lifted from those ITAR approvals.
- The destination countries that you are directly sending the ITAR material to.
- The legal entities, including their address, in those destination countries that you are directly sending the ITAR material to.

For ease of submission, this information can be collated into a spreadsheet or document that is uploaded as an annex to the application, noting the text limit of free text boxes and the 20 destination/entity limit in SPIRE.

### **When do I need to update an F680 for ITAR material?**

F680s for unclassified ITAR material will generally be approved for 48 months and will need to be updated on expiry if the approval is still required or if the scope of the programme of work in the extant F680 has changed.

### **Do I need F680 approval to send ITAR material to another Authorised User community member in the UK?**

No. There is no F680 requirement to share classified information with the UK Government or UK Contractors who are appropriately security cleared and have an appropriate need-to-know. However, it is also recognised that those UK companies only in receipt of Unclassified ITAR, may have to use some other formal mechanisms to correspond with the UK Government to advise MOD that they are transferring all of the ITAR material they hold, and have no further requirement for assurance inspection.

### **Do I need F680 approval to send ITAR material to another Authorised User community member overseas (i.e. in the US or Australia)?**

Potentially yes. There will not be a general requirement for F680 approval for releases of ITAR material, to US recipients, however, we understand there are some instances where US Government approval is required prior to the release of ITAR material from the UK to the US. Accordingly, in these instances, a F680 could be expected to also be applicable. F680 approvals for Authorised Users in Australia are required.

**Do I need F680 approval to release or discuss ITAR or OFFICIAL-SENSITIVE or above information or equipment to a foreign entity, even if the meeting takes place in the UK?**

Yes.

**Do I need F680 approval to release or discuss ITAR or OFFICIAL-SENSITIVE or above equipment or information with a potential foreign customer?**

Yes

**How long does an approval last for?**

ITAR and OFFICIAL-SENSITIVE approvals are valid for 48 months. Approvals for releases above OFFICIAL-SENSITIVE are valid for 24 months.

**If I have a valid F680 or F1686, do I need to reapply as a result of these changes?**

No, you can continue to rely on existing F680s or F1686 for the purposes of releasing all (both classified and unclassified) ITAR material within their scope. This will need to be updated as part of the next renewal of such F680 or F1686.

There will be no changes to existing PV Grading's, Security Grading Guides and Security Aspects Letters.

**How does an ITAR F680 affect existing export licences?**

It does not, those export licences which are required to support the programme of work will continue to be applied for and approved separately. The outcome of an application for an F680 for ITAR material does not impact the status or validity of those export licences.

**What if an application is urgent?**



If an F680 application for releases of unclassified ITAR material only is urgent and there is a requirement to transfer unclassified ITAR material before it is approved, you should raise the application on SPIRE and then email the [F680 ITAR Approvals mailbox](#) with the relevant SPIRE application reference number in order to obtain interim authorisation to release unclassified ITAR material.

### **Does this F680 change also apply to FMS and EAR?**

No, this just applies to ITAR material.

### **Will MOD need to be added to ITAR licences to permit inspections?**

We expect the assurance inspection for ITAR material to be an assessment of the company's security environment, access controls and records of ITAR release. We do not envisage underlying ITAR controlled material to require inspection under an F680 assurance visit so there is no need to add MOD to your ITAR licence authorisations for these purposes.

### **Are there any document marking or record keeping requirements associated with the revised F680 process?**

There are no new document marking or record keeping requirements as a result of the F680 process applicability for ITAR material. The document marking and records requirements in relation to unclassified ITAR material are as set out in the ITAR.

### **When do I need to update an ITAR F680?**

As F680 approvals for UNCLASSIFIED ITAR material are expected to be valid for 48 months, any requirements for amendment during this validity period should be agreed with ECJU. Material changes (i.e. those adding new countries or new USML Categories of ITAR material) will generally necessitate a new F680. Non-material changes (including changes to company registration details, names or addresses which are typically published by the US Directorate of Defence Trade Controls as a web notice) do not need to be updated immediately and could be amended the next time the F680 for UNCLASSIFIED ITAR material is updated, on renewal or upon HMGs request during an assurance activity.