

**United Kingdom
Strategic Export Controls
Annual Report 2023**

United Kingdom Strategic Export Controls Annual Report 2023

Presented to Parliament pursuant to Section 10 of the Export Control Act 2002
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Foreword

This is His Majesty's Government's 27th Annual Report on Strategic Export Controls. The report provides details of strategic export controls policy and export licensing decisions for the period January to December 2023, under the previous Government. This is the first annual report for the Department for Business and Trade (DBT) as the host department of the Export Control Joint Unit (ECJU), following a machinery of government change and the establishment of DBT on 7 February 2023.

Export controls seek to ensure that goods exported from the UK do not contribute to the proliferation of weapons of mass destruction (WMD) or a destabilising accumulation of conventional weapons; they protect the UK's security and expertise by controlling who has access to sensitive technologies and capabilities. Export controls also help ensure that controlled items are not used to commit or facilitate internal repression or a serious violation of international humanitarian law (IHL).

During 2023, HM Government continued to assess each export licence application on a case-by-case basis against the Strategic Export Licensing Criteria ("the Criteria", see Annex A). Export controls are kept under regular review in order that they properly address the threats we face, keep pace with new technologies, and adapt to changing circumstances.

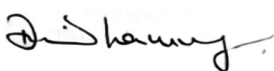
During 2023, ECJU processed 16,258 Standard Individual Export Licence (SIEL) applications, completing 52% within 20 working days, which is below our target of 70%. This report will describe the challenging operating context in which ECJU has been working, the factors affecting performance against targets, and the options we are exploring to remedy this.

HM Government continues to operate one of the most transparent licensing regimes in the world, publishing information on all licences issued, refused or revoked. This annual report demonstrates this Government's continued commitment to transparency and accountability.

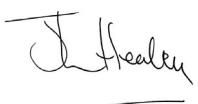
The report provides details of strategic export controls policy and export licensing decisions for the period January to December 2023, under the previous Government. Where relevant, we have included some developments for the period January to December 2024, some of which occurred following the General Election of July 2024 and therefore took place under the current Government.



The Rt Hon Jonathan Reynolds MP
Secretary of State for Business & Trade and President of the Board of Trade



The Rt Hon David Lammy MP
Secretary of State for Foreign, Commonwealth & Development Affairs



The Rt Hon John Healey MP
Secretary of State for Defence

Section 1:

Export licensing process and basics

1.1 The need for export licensing

Export controls protect global security by restricting who has access to sensitive technologies and capabilities, ensuring UK exports do not contribute to WMD proliferation, a destabilising accumulation of conventional weapons, or are used to commit or facilitate internal repression or to commit or facilitate a serious violation of IHL. They are a means by which we implement a range of international legal commitments, including the Arms Trade Treaty (ATT) and those resulting from United Nations (UN) arms embargoes or trade sanctions.

The Export Control Act 2002 and the Export Control Order 2008 provide the legal framework for the UK's export controls. A body of assimilated law and current EU legislation is also relevant. "Assimilated law" is the new name for the law that was retained from the period of the UK's membership of the EU.

Through this legislative framework, HM Government controls the export of a range of military and "dual-use"¹ items.

Under the terms of the Windsor Framework², certain EU legislation continues to apply to the movement of controlled goods in Northern Ireland. Section 4 sets out the changes to applicable legislation that occurred in 2023.

A product needs an export licence if it is included in:

- the UK Military List or national control list
- lists of controlled dual-use items covered by retained Council Regulation (EC) No 428/2009. For exports from Northern Ireland, the relevant regulation is Regulation (EU) 2021/821. These dual-use items are derived from the international export control regimes (set out in more detail in Section 8), which are:

1 Dual-use items are goods, software, technology, documents and diagrams which can be used for both civil and military applications. They can range from raw materials to components and complete systems, such as aluminium alloys, bearings, or lasers. They could also be items used in the production or development of military goods, such as machine tools, chemical manufacturing equipment and computers.

2 <https://www.gov.uk/government/publications/the-windsor-framework>

- The Nuclear Suppliers Group³
 - The Missile Technology Control Regime⁴
 - The Australia Group⁵
 - The Wassenaar Arrangement⁶
 - The Zangger Committee⁷
- the list of goods covered by retained Regulation (EU) 2019/125 concerning trade in certain goods which could be used for capital punishment, torture or other cruel, inhuman, or degrading treatment or punishment (the Torture Regulation), for exports from Northern Ireland, the relevant regulation is Regulation (EU) 2019/125
 - the list of items covered by retained Regulation (EU) No 258/2012, which establishes export, import and transit measures for firearms, their parts and components and ammunition, for exports from Northern Ireland, the relevant regulation is Regulation (EU) 258/2012
 - the list of goods covered by the Export of Radioactive Sources (Control) Order 2006

Even if an item does not appear on one of these lists, it may still require an export licence under Article 4 of retained Council Regulation (EC) No 428/2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items (for Northern Ireland it is Article 4 of Regulation (EU) 2021/821), if there are concerns about its end-use. “End-use” or “catch-all” controls aim to prevent the proliferation of WMD and their delivery systems, or the supply of items intended for a military end-use in an embargoed destination.

1.2 The Export Control Joint Unit

ECJU manages HM Government’s system of export controls and brings together policy and operational expertise from DBT, the Foreign, Commonwealth & Development Office (FCDO) and the Ministry of Defence (MOD). The individual departments within ECJU have distinct roles, and these are described under “Advisory departments”.

Departments involved in export control

The licensing process, and all the departments involved in licensing and/or enforcing the implementation of export controls, are set out, as follows:

3 <https://www.nuclearsuppliersgroup.org/index.php/en/>

4 <https://mtcr.info/>

5 <https://www.dfat.gov.au/publications/minisite/theaustraliagroupnet/site/en/index.html>

6 <https://www.wassenaar.org/genesis-of-the-wassenaar-arrangement/>

7 <https://zanggercommittee.org/>

Departments involved in export control

Licence Assessment

- Department for Business and Trade
- Foreign, Commonwealth & Development Office
- Ministry of Defence
- National Cyber Security Centre
- Department for Energy Security & Net Zero

Licence Enforcement

- HM Revenue and Customs, in partnership with Border Force
- UK Prosecution Authorities*

* Crown Prosecution Service (CPS in England and Wales); the Crown Office and Procurator Fiscal Service (COPFS in Scotland); and the Public Prosecution Service (PPS in Northern Ireland).

Department for Business and Trade (DBT)

DBT has overall responsibility for the export licensing process. The Secretary of State for Business and Trade is ultimately responsible for:

- the statutory and regulatory framework of the controls (i.e., what items and activities are controlled)
- the decision to grant or refuse an export licence in any individual case; and where necessary, the decision to suspend or revoke extant licences in accordance with the relevant legislation and policy

DBT performs a variety of roles to support the licensing process via a Licensing Unit, a Technical Advisory Unit, a Business Engagement Team, Compliance and Enforcement teams, a Data Team and a Corporate Business Management Team and Secretariat. A temporary team has also been recruited to deliver the new online export licensing system, Licensing for International Trade and Enterprise platform (LITE).

On 1 January 2023, DBT had a total number of 118 posts within ECJU (including those working on the LITE temporary project team), with 100 people in post and 18 vacant posts (15% vacancy rate). By the end of 2023, DBT's total number of posts within ECJU (including LITE) remained at 118, with 98 people in post and 20 vacant posts (17% vacancy rate).

Advisory departments

The principal advisory departments are the FCDO and the MOD.

Together, they provide DBT with advice and analysis on foreign policy, defence and development matters relevant to licensing. They do this by assessing all applications on a case-by-case basis against the Criteria.

Foreign, Commonwealth & Development Office (FCDO)

The FCDO team considers, among other issues, whether an export:

- will be consistent with the UK's international obligations and commitments and sanctions regimes
- might be used to commit or facilitate internal repression or to commit or facilitate a serious violation of IHL
- would contribute to or undermine peace and security
- could be used to commit or facilitate an act constituting an offence under international conventions or protocols to which the UK is a party, relating to transnational organised crime
- might be diverted to an undesirable user or for an undesirable end-use
- is compatible with the technical and economic capacity of the recipient country, if the country is on the World Bank's International Development Association list

The FCDO also provides advice to the MOD for some F680s (a security procedure assessing the release of UK classified material), whether the release of information would be consistent with the UK's international obligations and commitments and sanctions regimes.

In making its assessment on a case-by-case basis, the FCDO takes account of the proposed end use of the equipment, the situation in the destination, and the end user. They seek detailed political, sanctions, human rights advice as necessary from posts overseas and other sources, including Non-Governmental Organisations (NGOs), or media reporting.

On 1 January 2023, the FCDO had 16 posts within ECJU, with 15 people in post and one vacant post (6% vacancy rate). By the end of 2023, the FCDO had 19 posts within ECJU, with 18 posts filled and one vacant post (5% vacancy rate).

Ministry of Defence (MOD)

The MOD considers the military, operational, technical and security aspects of proposals to release classified material or export-controlled goods to foreign end users. The MOD advises on the risk of any export being used against the UK Armed Forces and those of our Allies, and any potential threat to the security of the UK or Allies. The MOD jointly leads with the FCDO on assessing the risk of diversion or re-export of goods to end users of concern.

The MOD's advice on export licence applications is given on a case-by-case basis and assesses the views of those responsible for protecting the capability of the UK's Armed Forces, as well as security and intelligence specialists. The MOD also operates the MOD Form 680 (F680) approval process which enables HM Government to control the release of classified equipment or information to foreign entities without compromising the UK's national security. The MOD is also responsible for processing gifting applications on behalf of HM Government (further details can be found in Sections 6 and 7).

On 1 January 2023, the MOD had 9 posts within ECJU, with 8 posts filled and 1 vacant post (11% vacancy rate). By the end of 2023, the MOD had 9 posts within ECJU, with 8 posts filled and one vacant post (11% vacancy rate).

National Cyber Security Centre (NCSC)

The NCSC is HM Government's national technical authority for information security and advises on applications for goods involving sensitive communications or computer technology.

Department for Energy Security and Net Zero (DESNZ)

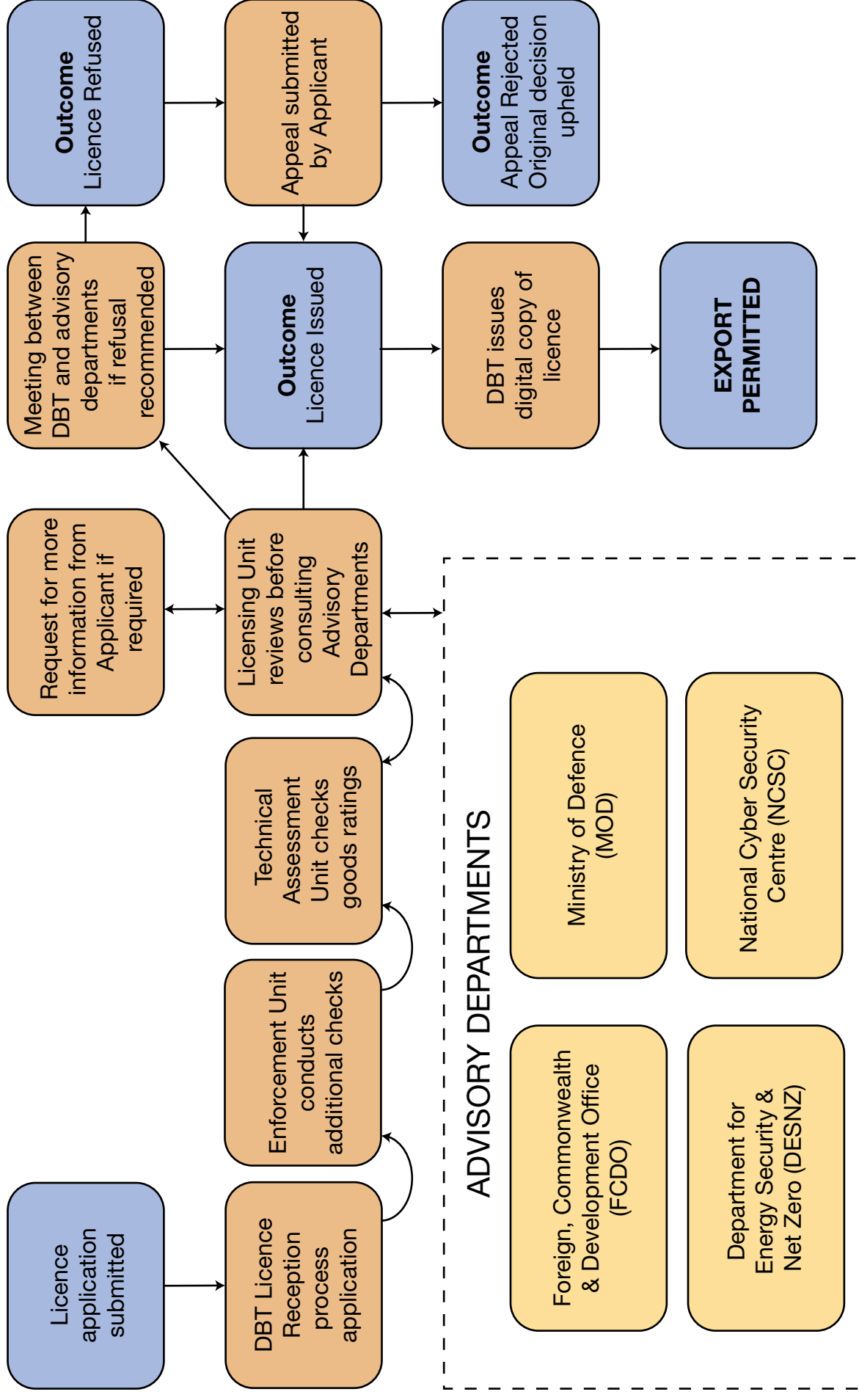
DESNZ plays a key role in HM Government's chemical and nuclear non-proliferation policy. DESNZ ensures HM Government continues to meet its obligations under the Chemical Weapons Convention (CWC) and Nuclear Suppliers Group (NSG). For the CWC, DESNZ ensures CWC Schedule 1 chemical exports are appropriately licensed by the UK National Authority, that the restrictions on certain chemical exports are highlighted and, where appropriate, documentation approved by other governments is acquired prior to making recommendations to DBT. For the NSG, DESNZ ensures that any additional documentation required from other governments is secured in advance of providing a recommendation to DBT.

HM Revenue and Customs (HMRC)

While HMRC does not provide direct advice on applications, it does have responsibility for the enforcement of export and trade controls, as well as sanctions and embargoes. HMRC works with the Border Force to prevent, detect and investigate breaches.

A decision whether to commence a prosecution arising from an HMRC criminal investigation is made by the relevant prosecuting authority, who will also undertake the conduct of any subsequent prosecution. This is the Crown Prosecution Service for England and Wales, the Crown Office and Procurator Fiscal Service in Scotland and the Public Prosecution Service for Northern Ireland.

Standard Individual Export Licence (SIEL) process



1.3 Overview of export licence types and processing times

Applications for export, trade ('brokering'), or transshipment licences for controlled goods are submitted to ECJU either through its legacy digital system known as SPIRE (Shared Primary Information Resource Environment), or through its new digital system, which is being gradually introduced known as LITE (Licensing for International Trade and Enterprise). Further detail is available in Section 3.2.

Applications must include details about who will use the goods and what they intend to do with them. This information is considered as part of the overall assessment process. Applications must include technical specifications, sufficient to allow experts in ECJU to determine whether the goods are specified by the control lists and therefore need an export licence.

Table 1.1 Summary of applications and registrations

Licence type	Applications and registrations received in 2023
Standard Individual Export Licences (SIELs)	16,652 ⁸
Open Individual Export Licences (OIELs)	455
Open General Export Licences (OGELs)*	1,309
Retained General Export Authorisations (GEAs)*	234
Union General Export Authorisations (GEAs)*	40
Standard Individual Trade Control Licences (SITCLs)	218
Open Individual Trade Control Licences (OITCLs)	54
Open General Trade Control Licences (OGTCLs)*	77
Standard Individual Transshipment Licences (SITLs)	14
Open General Transshipment Licences (OGTLs)*	5
General Trade Licences*	182

* Registrations

A list of licence types, including a description of each, is set out in Annex B.

⁸ 15,220 SIEL applications were made on the SPIRE system and 1,432 were made on the new online export licensing system, LITE.

Section 2:

Export licensing data

2.1 Transparency

HM Government publishes comprehensive Official Statistics⁹ each quarter providing data about decisions made on licence applications including those issued, refused, rejected, or revoked. In addition, we provide an online searchable database (Strategic Export Controls: Reports and Statistics website)¹⁰ allowing users to produce bespoke reports drawing on this data. We remain committed to openness and transparency of strategic export licensing to provide the means for Parliament and the public to hold HM Government to account.

Part of the development of ECJU's new digital system, LITE, is its ability to extract and report on data relating to LITE licensing decisions. Throughout 2023, this was a work in progress and while the required data related functionality was still being developed, ECJU reduced some of the data it published on licensing decisions made in LITE. Specifically, LITE licensing data was excluded from our online searchable database known as the Strategic Export Controls: Reports and Statistics website, which enables users to create reports based on their own criteria. LITE licensing data was also excluded from some of the more detailed data tables provided within our strategic export controls licensing decisions Official Statistics publications throughout 2023. These limitations were appropriately caveated alongside the impacted figures.¹¹ Furthermore, any impacted figures within the annual report have also been clearly caveated.

For context, only 9% (1,143) of licensing decisions were made in LITE during 2023, compared with 91% (10,889) in SPIRE. The vast majority of data for all decisions, including those made on LITE, was still included within our 2023 Official Statistics publications which means we still published data that provided a comprehensive overview of the export control licensing system.

As further LITE functionality is rolled out, we will be able to increase gradually and improve the data published from LITE. This will be an iterative process, and we will retrospectively publish all LITE data that was omitted during the transition period to ensure there is no overall reduction in transparency.

⁹ <https://www.gov.uk/government/collections/strategic-export-controls-licensing-data#quarterly-reports>

¹⁰ <https://www.exportcontroldb.trade.gov.uk/sdb2/fox/sdb/>

¹¹ <https://www.gov.uk/government/publications/strategic-export-control-statistics-statement-of-administrative-sources/export-licensing-statistics-statement-of-administrative-sources>

We are also using the development of LITE as an opportunity to improve the way we publish data. We will continue to publish the strategic export controls licensing Official Statistics in the same overall format but are changing and improving how we publish data through the online searchable database website, with development of the replacement service underway. These changes are based on research with known users of the online searchable database website to make sure the format best meets their needs.

2.2 Data for each licence type

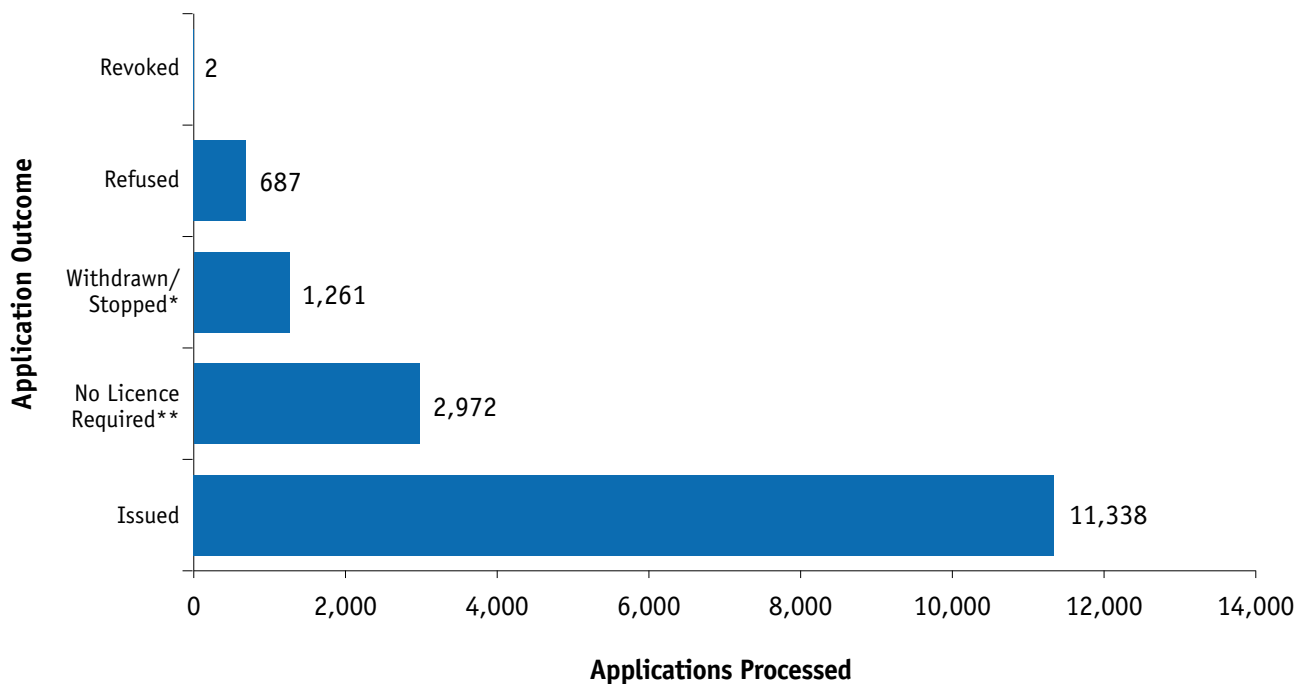
The following tables and charts provide details of the outcomes during 2023 on each of the main types of licence. Those processed to completion in 2023 will also include applications originally received in 2022, and a few before that. Any data referred to as “Issued”, “Refused”, “Rejected” or “Revoked” is taken from the Official Statistics available on GOV.UK.

Comprehensive data on export licensing decisions is published regularly throughout the year on GOV.UK. All other data in this section is taken from the SPIRE and LITE licensing databases as of 6 March 2024, unless an alternative date is stated.

Table 2.1 Summary of application outcomes

Outcome	SIELs	SITLs	OIELs	SITCLs	OITCLs
Issued	11,338	5	289	109	5
Refused / Rejected	687	0	62	3	1
No Licence Required	2,972	2	3	20	0
Withdrawn, Stopped or Unsuitable	1,261	10	120	65	38
Revoked	2	0	1	1	14

Chart 2.1 Standard Individual Export Licences (SIELs)



* Applications may be withdrawn by the exporter during processing. They may also be stopped by ECJU, if an exporter has not provided further information, when requested, that is necessary to allow the application to be processed.

** Some applications are submitted for goods that do not require an export licence. Where this is determined, the applicant is informed that no licence is required.

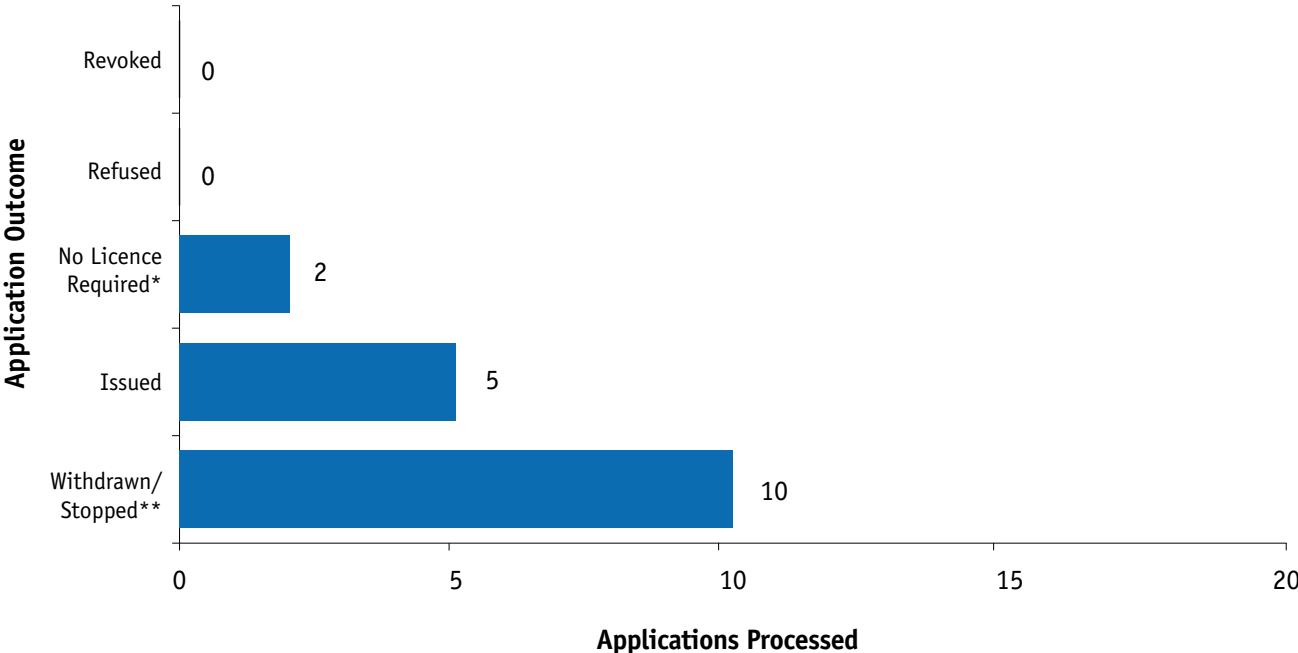
SIEL data published on GOV.UK shows how many licences are issued, refused or revoked for the export of items to the destination concerned and whether they were for a permanent or temporary export. The data is split into:

- Military List
- non-military items
- both (covering licences with military and non-military goods)
- items covered by the Torture Regulation and/or a mix of both Military List and non-military items

The total value of SIEL licences granted does not indicate the actual value of exports shipped during the reporting period, but it is instead the stated export value from the application. Licences usually cover a 2-year validity period and goods can be exported at any time during that period. Moreover, some licences will not be used to carry out all the exports authorised, and others will not be used at all. Some items may be exported only temporarily and later returned to the UK within the validity of the licence. If licences expire before being used or only partially used, exporters may then apply for new licences, which can lead to an element of “double counting” in statistics.

Information is provided separately within the Official Statistics on items licensed under SIELs, intended to be incorporated into a good or product, for example, sensors for a military aircraft being exported to the aircraft manufacturer in one destination, who intends to export the complete aircraft to one or more ultimate end user destinations. An aggregated summary of the ultimate end user destinations for the goods, after incorporation, is included as part of the Official Statistics data.

Chart 2.2 Standard Individual Transshipment Licences (SITLs)

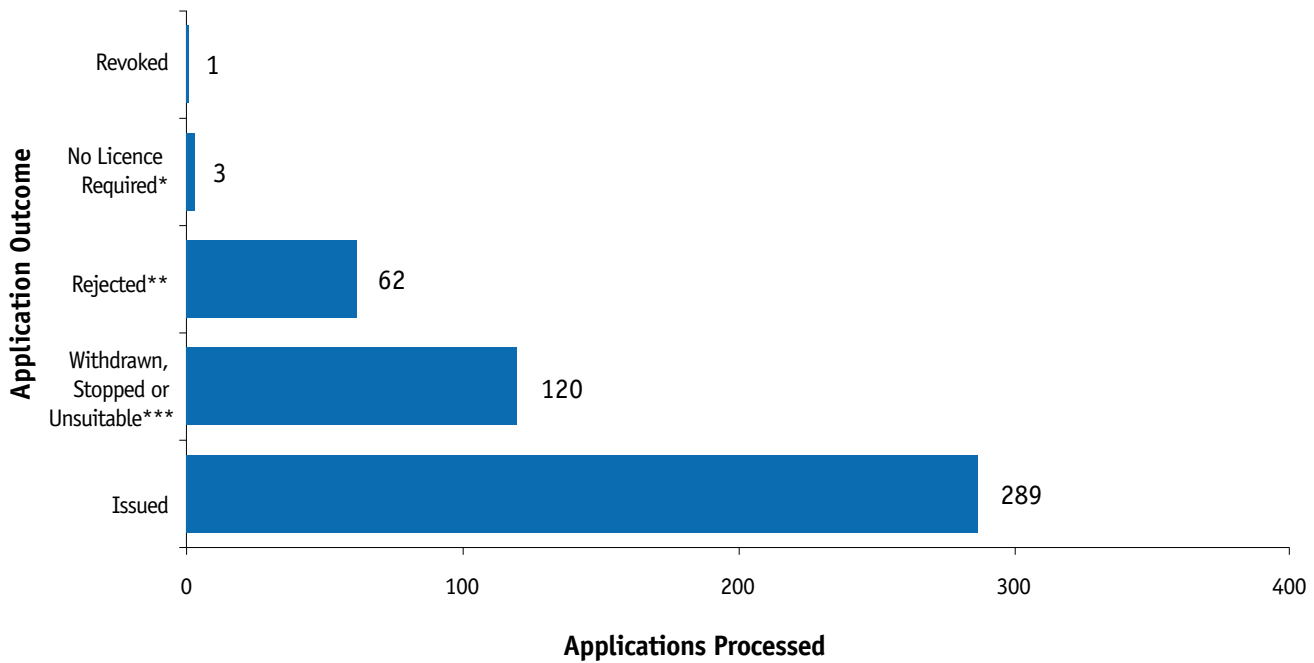


* Some applications are submitted for goods that do not require an export licence. Where this is determined, the applicant is informed that no licence is required.

** Applications may be withdrawn by the exporter during processing. They may also be stopped by ECJU, if an exporter has not provided further information, when requested, that is necessary to allow the application to be processed.

Information on SITLs is provided in the same format as for SIELs. The licensing information can be found under each destination, listed as “SIELs – transshipments”. As the items covered by SITLs only pass through the UK, it would be misleading to compare the monetary value for these licences with the value of items originating in the UK.

Chart 2.3 Open Individual Export Licences (OIELs)



* Some applications are submitted for goods that do not require an export licence. Where this is determined, the applicant is informed that no licence is required.

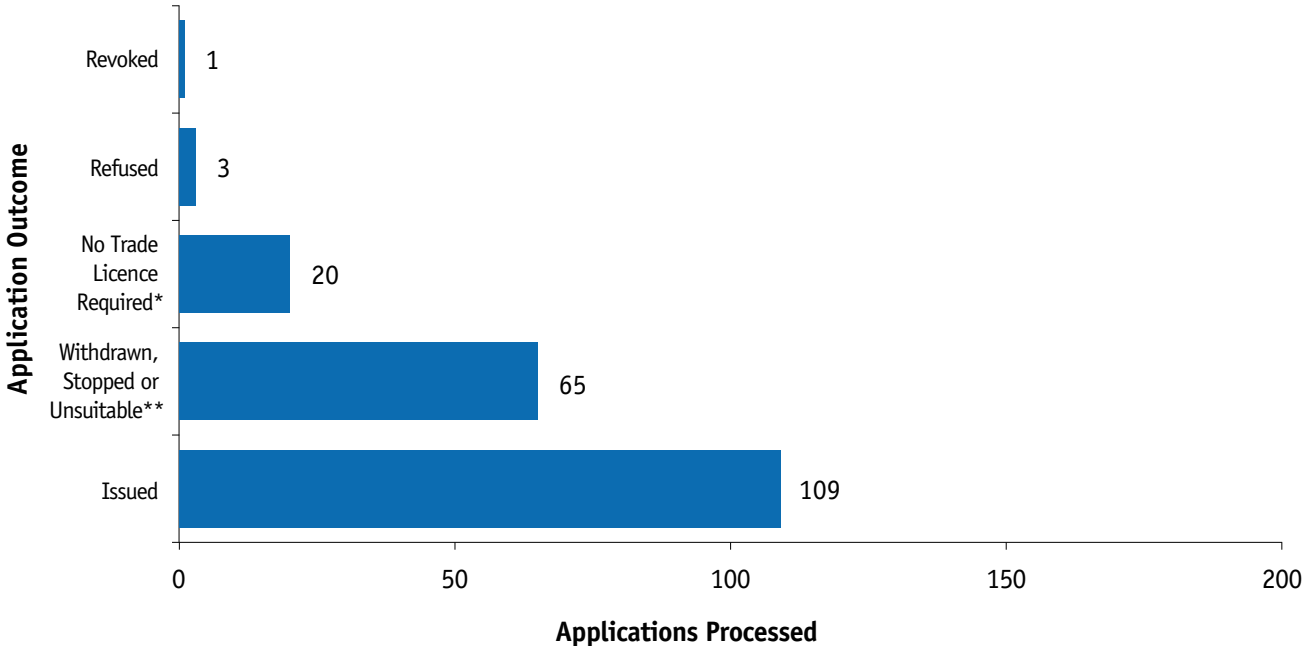
** Some applications are not suitable for open individual export licences and may need the scrutiny that a standard individual export licence application provides to fully address and assess the risk. In such cases the OIEL application is rejected, and exporters are recommended to apply for SIELs.

*** Applications may be withdrawn by the exporter during processing. They may also be stopped by ECJU, if an exporter has not provided further information, when requested, that is necessary to allow the application to be processed.

The OIELs data on GOV.UK include the number of licences issued, rejected or revoked for each destination. As OIELs cover multiple shipments of specified goods to specified destinations or specified consignees, exporters holding OIELs are not asked to provide details of the quantities, or values of goods they propose to ship, and it is therefore not possible to provide information on the total value of goods that are licensed. Companies are however required to submit annual open licence returns about usage for each of their OIELs.

HM Government is continuing to improve the reliability of the data we collect about open licence use, including within the development of LITE, our new online export licensing system, and a new Customs Declaration System (CDS). Once these new systems are in place, we will be able to explore options for greater transparency.

Chart 2.4 Standard Individual Trade Control Licences (SITCLs)

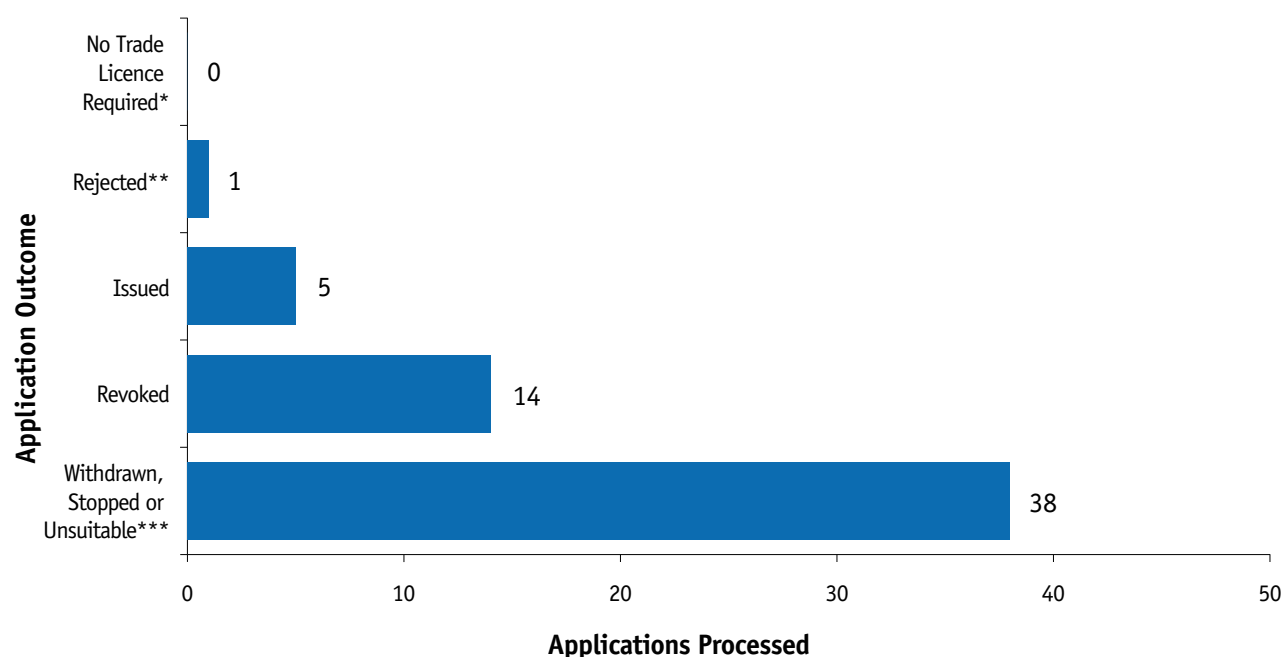


* Some applications are submitted for goods that do not require a trade control licence. Where this is determined, the applicant is informed that no licence is required.

** Applications may be withdrawn by the exporter during processing. They may also be stopped by ECJU, if an exporter has not provided further information, when requested, that is necessary to allow the application to be processed.

As SITCLs cover the trading of specific goods between overseas source and destination countries, there is no physical export from the UK, and traders are not asked to provide information on the monetary value of goods.

Chart 2.5 Open Individual Trade Control Licences (OITCLs)



* Some applications are submitted for goods that do not require a trade control licence. Where this is determined, the applicant is informed that no licence is required.

** Some applications are not suitable for OITCLs and may need the scrutiny that a standard individual licence application provides to fully address and assess the risk. In such cases the OITCL application is rejected, and exporters are recommended to apply for SITCLs.

*** Applications may be withdrawn by the exporter during processing. They may also be stopped by ECJU, if an exporter has not provided further information, when requested, that is necessary to allow the application to be processed.

As OITCLs cover the trading of specific goods between an overseas source and one or more destinations, exporters holding OITCLs are not asked to provide details of the monetary value of goods they propose to trade.

2.3 Performance against targets

In its service to exporters, ECJU abides by HM Government's Service and Performance Code.¹²

ECJU's current performance targets are to complete 70% of applications for SIELs within 20 working days, and 99% within 60 working days.

The targets apply once the applicant has supplied the documentation necessary to begin the assessment of their application. Where further information is requested, the time required for the exporter to provide that information is not counted against the targets.

The targets do not apply to OIELs, nor OITCLs because they are tailored specifically to address an exporter's requirements. The flexibility and complexities mean there is a wide variation in the goods and destinations covered by such licences, so it is not possible to offer standard target processing times. However, ECJU seeks to process 60% of OIEL applications within 60 working days.

¹² <https://www.gov.uk/government/publications/service-and-performance-code-for-export-licensing/ecju-service-and-performance-code>

We monitor performance against our government targets on SIELs on a weekly basis, looking for trends or emerging issues that we need to address, and prioritise resources across our teams accordingly. We continue to pay particular attention to long outstanding applications (i.e. those over 60 working days old) and have established a dedicated process involving our advisory departments to scrutinise these cases and ensure they are progressed. The effectiveness of our long outstanding case process was reviewed during 2023 and recommendations implemented to further improve our approach to reduce the stock.

Table 2.2 (SIEL and SITCL Processing Performance) gives a breakdown of the performance of HM Government in 2023 against the 2 main published SIEL and SITCL targets. Information for 2021 and 2022 is also provided for comparative purposes.

Table 2.2 SIEL and SITCL Processing Performance

Outcomes	2023		2022		2021	
	SIELs*	SITCLs	SIELs	SITCLs	SIELs	SITCLs
Number of applications completed in 20 working days	7,746	115	10,676	108	11,289	94
% of applications completed in 20 working days	52%	59%	62%	53%	69%	45%
Number of applications completed in 60 working days	13,049	182	15,329	166	15,028	169
% of applications completed in 60 working days	87%	93	89%	81%	91%	81%
Median processing time	20 days	15 days	16 days	20 days	15 days	23 days

* SIEL figures for 2023 do not include SIELs processed in LITE. In total, there were 1,287 SIELs closed in LITE during 2023 that have not been included in these figures, accounting for 8% of all SIELs processed (in SPIRE and LITE) respectively.

The key operational priorities for ECJU for 2023 were to adapt our processes to efficiently manage the impact of increasing volumes of complex applications, and to focus on the development of the new LITE service to meet its ultimate objective of facilitating a more efficient and transparent licensing system.

ECJU strives to meet its licensing targets and is extremely mindful of the commercial pressures that businesses face – and thus the need to process licence applications with minimum delay. However, some destinations or goods types remain more challenging and will take longer than our target times to complete, as we continue to maintain our robust export controls regime. ECJU receives a high proportion of complex applications which are more time consuming to assess. Applications which are finely balanced, or complex, take longer to assess than lower risk cases. The increased proportion of higher risk applications has inevitably impacted on our performance targets. In 2023, ECJU conducted analysis of the evidence underpinning this increase and its implications for our processes which we have used to shape our programme of continuous improvement throughout 2024.

Some of the specific challenges that influenced our operating context and impacted on our performance include:

- the development and expansion of our already extensive sanctions against Russia, which require detailed checks on licensing grounds
- the continued impact of the revised Military End-Use Controls (MEUC) and their extension to China
- managing a number of 'Change in Circumstances (CiC) Reviews' (undertaken in response to the changing situations in destination countries and regions) which require detailed and complex assessments of extant licences
- prioritising licensing and gifting to Ukraine

In addition to these geo-political challenges, the export licensing service is also going through a major digital transformation requiring ECJU Case Officers and advisers to operate across 2 different systems as we gradually transition from our legacy system, SPIRE to our new service, LITE. Licensing teams are closely involved in the development of the new digital service to ensure it is designed effectively. This is important for making sure the new system delivers genuine improvements for all our users, but does create additional pressures on the teams overall capacity.

During 2023, ECJU-DBT was able to address some of the resourcing challenges of 2022 following successful recruitment campaigns both for Technical Assessment Officers and Case Officers. ECJU-DBT recruited a range of colleagues in the newly established Darlington office and concluded the structural changes within the Operational Command following an organisational re-design. As the new team members were inducted and trained, we have seen a corresponding improvement in performance and increased resilience.

While we accept there is still some way to go in meeting our public targets, 2023 saw the introduction of a number of new measures and continuous improvement initiatives which have put ECJU in a stronger position for 2024. For example, we have a dedicated data team providing us with a larger range of live data to help us to monitor the application pipeline more effectively and take quicker steps to solve issues or re-prioritise resource; we have established a new process to scrutinise our long outstanding case stock more regularly to focus more closely on progressing those cases; and we are working with our advisory teams to help them develop new processes to deal with the higher volumes of cases requiring their detailed assessment.

2.4 Refusals

There were 690 SIELs and SITCLs refused in 2023, compared with 433 in 2022. Table 2.3 contains the number of refusals per Strategic Export Control Criteria.

The refusal rate has increased from 2.5% of applications in 2022 to 4.2% in 2023. ECJU only refuses licence applications once a thorough and robust process has been followed to ensure that the risks involved have been sufficiently assessed to justify a decision to refuse.

One legal and policy change which contributed to the increase in licences refused in 2022 and 2023 was strengthening the MEUC in May 2022. The combination of widening the scope and extending the control to include China, led to an increase in export licence refusals on national security grounds in 2022, a trend which continued in 2023. Exports refused under the strengthened control could not have previously been prevented; the revised MEUC has therefore demonstrated its capability to prevent exports of concern and manage risks to national security. However, given

the processing timeframes for these kinds of applications are typically longer on average, this has contributed to an increase in processing times for some applications and has had a wider effect on our processing performance more generally.

Table 2.3* Reasons for refusals of SIEL and SITCL applications

Reason for refusal	2023	2022	2021
Criterion 1 – UK’s international obligations and commitments under non-proliferation Treaties and Conventions and export control regimes, particularly with regard to proliferation of weapons of mass destruction or ballistic missiles	6	1	0
Criterion 1 – UK’s commitments and obligations to observe UN, OSCE and UK arms embargoes	39	48	6
Criterion 1 – Announced national measures or restrictions	8	6	13
Criterion 1 – UK’s obligations under the United Nations Convention on Certain Conventional Weapons, the Convention on Cluster Munitions (the Oslo convention) and the Ottawa Convention and the 1998 Land Mines Act	0	0	0
Criterion 2 – Risk of use to commit or facilitate internal repression or to commit or facilitate a serious violation of international humanitarian law	22	24	23
Criterion 3 – Preservation of internal peace and security	1	0	0
Criterion 4 – Preservation of peace and security	3	2	1
Criterion 5 – National security of the UK, as well as that of friendly and allied countries	175	94	82
Criterion 6 – Behaviour of the buyer country with regard to the international community	0	0	0
Criterion 7 – Risk of diversion to an undesirable end-user or for an undesirable end-use	321	199	148
Criterion 8 – Compatibility of the arms exports with the technical and economic capacity of the recipient country	0	0	0
**Catch-all controls for non-listed items – weapons of mass destruction	77	55	56
***Catch-all controls for non-listed items – Military End-Use	447	108	23

* Decisions to refuse often involve more than one criterion. Therefore, the figures quoted in this table, when they are added together will exceed the total number of applications refused in 2023.

** Catch-all controls (WMD) – these were previously listed under Criterion 1, UK’s international obligations and commitments. We have separated the data to show cases where the WMD end-use control was invoked for non-listed exports or transfers which were intended for WMD purposes.

*** refusals under the new provisions of the MEUC, implemented in 2022, were most reported under announced national measures in the 2022 Annual Report. To show the impact of the changes, cases where the military end-use control was invoked have been separated into a new row. Refusals made under the elements of the control derived from

the retained Dual-Use Regulation (relating to the manufacture or development of military items in a destination subject to an arms embargo) are still reported under Criterion 1, UK's commitments and obligations, to observe UN, OSCE and UK arms embargoes.

The data in Table 2.3 does not include decisions to reject OIELs or OITCLs in full or in part, or amendments to the coverage of an OIEL to exclude destinations and/or goods. This is because a decision to exclude a destination from OIELs or OITCLs does not prevent a company applying for SIELs or SITCLs, covering some or all the goods concerned to specified consignees in the relevant destinations.

2.5 Revocations

Licence revocations are where a granted licence is revoked in full or in part. This typically occurs when there is a change of circumstance in the recipient country, and the export is no longer consistent with the Criteria. There were 3 revocations of SIELs and SITCLs in 2023. Table 2.4 provides an overview of the number of times each of the Criteria was used to justify the revocation of an export licence.

Table 2.4* Reasons for revocations of SIEL and SITCL licences

Reason for revocation	2023	2022	2021
Criterion 1 – UK's international obligations and commitments under non-proliferation Treaties and Conventions and export control regimes, particularly with regard to proliferation of weapons of mass destruction or ballistic missiles	1	0	0
Criterion 1 – UK's commitments and obligations to observe UN, OSCE and UK arms embargoes	1	105	0
Criterion 1 – Announced national measures or restrictions	0	0	0
Criterion 1 – UK's obligations under the United Nations Convention on Certain Conventional Weapons, the Convention on Cluster Munitions (the Oslo convention) and the Ottawa Convention and the 1998 Land Mines Act	0	0	0
Criterion 2 – Risk of use to commit or facilitate internal repression or to commit or facilitate a serious violation of international humanitarian law	1	1	0
Criterion 3 – Preservation of internal peace and security	0	0	0
Criterion 4 – Preservation of peace and security	1	0	0
Criterion 5 – National security of the UK, as well as that of friendly and allied countries	1	0	0
Criterion 6 – Behaviour of the buyer country with regard to the international community	0	0	0
Criterion 7 – Risk of diversion to an undesirable end-user or for an undesirable end-use	2	1	22
Criterion 8 – Compatibility of the arms exports with the technical and economic capacity of the recipient country	0	0	0

Reason for revocation	2023	2022	2021
**Catch-all controls for non-listed items – weapons of mass destruction	0	0	0
***Catch-all controls for non-listed items – Military End-Use	0	0	0

* Decisions to revoke often involve more than one criterion. Therefore, the figures quoted in this table, when they are added together will exceed the total number of licences revoked in 2023. Decisions to revoke during 2023 were for extant licences issued during 2023 or the previous 2 years.

** Catch-all controls (WMD) – these were previously listed under Criterion 1, UK’s international obligations and commitments. We have separated the data to show cases where the WMD end-use control was invoked for non-listed exports or transfers which were intended for WMD purposes.

*** revocations under the new provisions of the MEUC, implemented in 2022, were reported under announced national measures in the 2022 Annual Report. To show the impact of the changes, cases where the military end-use control was invoked have been separated into a new row. Revocations made under the elements of the control derived from the retained Dual-Use Regulation (relating to the manufacture or development of military items in a destination subject to an arms embargo) are still reported under Criterion 1, UK’s commitments and obligations, to observe UN, OSCE and UK arms embargoes

2.6 Appeals

Table 2.5* Appeals outcome and performance

Outcomes	2023	2022	2021
Number of Appeals received**	95	38	47
Number of Appeals finalised	50	19	53
Median processing time for finalised Appeals	80 days	46 days	108 days
Number of Appeals where refusal was upheld	46	18	47
Number of Appeals where refusal was overturned ***	4	1	6

* Data is based on management information records as of 19 March 2024.

** An Appeal can be withdrawn, finalised in a later year, or can be still under consideration.

*** This figure includes one successful appeal concluded as No Licence Required.

Appeals against refusals will often raise difficult and complex issues and are considered by a senior official not involved in the original decision. Any new information not available at the time of the initial application will be considered. The time taken to decide an appeal can be lengthy because of the need to examine afresh all relevant information. In 2023, there was a marked increase in the number of appeals received in line with increases in overall refusal rates. This had an impact on timeliness and ECJU performance figures. 73 of the 95 (77%) appeals received in 2023 related to the revised control under military end-use, which came into force in 2022. This in turn added to existing pressures on licensing and advisory teams.

In response to the increase in the number of appeals being raised, ECJU undertook a review of the appeals process. A number of recommendations will be taken forward to improve overall efficiency and timeliness as part of a programme of continuous improvement.

An applicant may appeal a decision to refuse a SIEL, SITCL, SITAL or OITAL (see Annex B for a full list of definitions), or against a decision to revoke a SIEL or SITCL. There is no provision for a formal appeal against reject or revocation decisions relating to OIELs or OITCLs. This is because such decisions do not prevent a company from applying for SIELs or SITCLs.

The time taken to handle an appeal is calculated from the date on which the appeal is received by ECJU and not the date of the original application.

2.7 Data on other types of licence

ECJU also processes applications for other licence types which do not fall under the main categories listed in Table 1.1. These include services licences linked to trade sanctions, technical assistance licences for ad hoc requirements, and Global Project licences for military goods and technologies between partner states who are participating in specific collaborative defence projects (see Annex B for a full list of definitions)

Table 2.6 Other licence type licence decisions

Licence application type	Licence sub-type	Issued	Refused	Revoked
Standard Individual Technical Assistance Licences	WMD (Weapons of Mass Destruction)	0	0	0
Standard Individual Technical Assistance Licences	Sanctions	0	0	0
Standard Individual Technical Assistance Licences	Energy related items under the Russia Sanctions	0	0	0
Standard Individual Technical Assistance Licences	Russia Sanctions – Other	0	0	0
Open Individual Technical Assistance Licences	WMD (Weapons of Mass Destruction)	0	0	0
Open Individual Technical Assistance Licences	Sanctions	0	0	0
Open Individual Technical Assistance Licences	Energy related items under the Russia Sanctions	0	0	0
Open Individual Technical Assistance Licences	Russia Sanctions – Other	1	2	0
Individual Financial Services Licences	Energy related goods	0	0	0
Individual Financial Services Licences	Restricted goods and technology	1	0	0
Individual Financial Services Licences	Vulnerable goods and revenue generating goods	2	0	0
Individual Financial Services Licences	Financial services, funds and brokering services relating to certain arrangements	11	0	0

Licence application type	Licence sub-type	Issued	Refused	Revoked
Brokering Services Licences	N/A	0	0	0
Syrian Humanitarian Licences	N/A	5	0	0
Financial Services, Brokering Services and Technical Assistance Licences	N/A	1	0	0
Professional and Business Services Licences	N/A	31	4	0
Licence for energy-related goods	N/A	1	0	0
Licences for drugs used in execution by lethal injection	N/A	46	0	0
Global Project Licences	N/A	0	0	0

A list of other licence types, including a description of each, is set out in Annex B.

2.8 OGELs and Retained and Union General Export Authorisations

The nature and purpose of OGELs is set out in Annex B.

OGELs may be republished¹³ as a result of updates to the UK Strategic Export Control Lists and/or due to changes to the general terms and conditions or permitted destinations.

A summary of key changes affecting OGELs in 2023 is set out in Annex C. A list of OGELs and other general licences in force in 2023 is set out in Annex D.

13 <https://www.gov.uk/government/collections/open-general-export-licences-ogels>

Section 3:

Modernising ECJU

3.1 Improving the way we work

The formal Transformation Programme closed at the end of 2022; however, work continued to embed new ways of working throughout 2023 and 2024. Guidance and frameworks were reviewed under the 'People', 'Culture' and 'Governance' workstreams to understand processes and productivity. We launched the Data Driven Operations project to maximise ECJU's use of data to support operational service delivery and evidence-based policy development. The project is looking to create a culture that prioritises using data to identify and understand how ECJU's operation could be made more efficient, and thus to inform management decisions and underpin performance and service improvements.

We have introduced new templates, tools and guidance to develop this approach further, which has been implemented through 2023 and 2024. Completing these outputs gradually has meant that operational teams are fully engaged with these improvements while maintaining delivery of the day-to-day export licensing service and engaging with the design and delivery of the new digital online system.

ECJU wants continuous improvement to be an integral and prominent part of the way we work to help us achieve our future goals. During 2023 work was undertaken to understand what a continuous improvement culture could look like across ECJU including understanding continuous improvement processes in other government departments, and how these are embedded. This discovery work allowed us to launch a continuous improvement campaign in Spring 2024, which seeks to build on a strong base of expertise within ECJU, and the priorities identified in the earlier Transformation Programme, including a mechanism for staff to submit their own ideas for consideration. The wider context to this initiative includes the emphasis on working as "one DBT," in the newly created department, and effective engagement with business.

Introducing a programme of continuous improvement is a long-term programme, which requires us to identify incremental improvements in our processes, while also embedding an inquisitive and learning culture within ECJU. We now have dedicated permanent continuous improvement resource within ECJU, and it remains a focus of senior leadership.

3.2 Modernising the new online digital system for export licensing

The Licensing for International Trade Enterprise (LITE) programme remained in private beta phase, with a limited number of exporters using the system to apply for a SIEL. Exporters are using the system in a controlled manner, allowing time to test and improve the service. Public Beta was launched in September 2024. Any exporter, with a few exceptions for specific licences, can now register on LITE to apply for a SIEL.

Extensive industry engagement and user research has taken place, through a variety of face-to-face and online events as well as with internal users across DBT and other government departments. Support is provided through a dedicated help desk, with training videos and guidance documents available to assist exporters.

More broadly, beyond SIELs, we are now looking to develop additional functionality on LITE and commence the decommissioning of SPIRE, the legacy system.

Section 4:

Updates on legislation

4.1 Changes in UK and EU legislation in force relating to export licensing.

The Export Control Act 2002 and the Export Control Order 2008 provide the legal framework for the UK's export controls. A body of assimilated law, and current EU legislation under the terms of the Windsor Framework¹⁴, is also relevant. "Assimilated law" is the new name for the law that was retained from the period of the UK's membership of the EU.

Assimilated law relevant to export control is:

- the retained Regulation (EU) No 258/2012 – which establishes export, import and transit measures for firearms, their parts and components and ammunition. It applies to exports from the customs territory of Great Britain
- the retained Regulation (EU) 2019/125 – which applies to the trade in certain goods which could be used for capital punishment, torture or other cruel and inhuman or degrading treatment or punishment
- the retained Council Regulation (EC) 428/2009 – which provides the legislative framework of controls on dual-use items (goods, including software and technology which can have both civil and military applications) and controls their export, transfer, brokering and transit in Great Britain

¹⁴ <https://www.gov.uk/government/publications/the-windsor-framework>

Table 4.1 Amendments to export control legislation in 2023

Title	Reference	Description
The Export Control (Military and Dual-Use Lists) (Amendment) Regulations 2023 ¹⁵	2023 No. 302	<p>This instrument amends Schedule 2 to the Export Control Order 2008, which lists the military goods, software and technology subject to strategic export controls, to reflect changes to the UK’s international export control commitments.</p> <p>This instrument amends Schedule 3 to the Export Control Order 2008, which lists UK Controlled Dual-Use Goods, Software and Technology, to amend a heading of one of the control entries.</p> <p>This instrument amends the retained Council Regulation (EC) No 428/2009 of 5 May 2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items to reflect changes to the UK’s international export control commitments.</p>
The Export Control (Amendment) Regulations 2023 ¹⁶	2023 No. 695	<p>This instrument amends Schedule 4 to the Export Control Order 2008, to move Haiti from Part 4 of Schedule 4 to Part 3 of Schedule 4.</p> <p>This instrument amends the retained Council Regulation (EC) No 428/2009 of 5 May 2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items to reflect changes to the UK’s international export control commitments.</p>
The Export Control (Amendment) (No 2) Regulations 2023 (SI 2023 No. 1048) ¹⁷	2023 No. 1048	<p>This instrument amends Schedule 4 to the Export Control Order 2008, to remove Syria from Part 2 of Schedule 4.</p> <p>This instrument amends the retained Council Regulation (EC) No 428/2009 of 5 May 2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items to remove duplicated wording.</p>

15 <https://www.legislation.gov.uk/uksi/2023/302/contents/made>

16 <https://www.legislation.gov.uk/uksi/2023/695/contents/made>

17 <https://www.legislation.gov.uk/uksi/2023/1048/contents/made>

Title	Reference	Description
Commission Delegated Regulation (EU) 2023/996 of 23 February 2023 amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items ¹⁸	Commission Delegated Regulation (EU) 2023/996	Update to Annex I of Regulation (EU) 2021/821 ¹⁹ .
Commission Delegated Regulation (EU) 2023/2616 of 15 September 2023 amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items ²⁰	Commission Delegated Regulation (EU) 2023/2616	Update to Annex I of Regulation (EU) 2021/821.

18 https://eur-lex.europa.eu/eli/reg_del/2023/996/oj

19 <https://eur-lex.europa.eu/eli/reg/2021/821>

20 https://eur-lex.europa.eu/eli/reg_del/2023/2616/oj

Section 5:

External engagement

5.1 Parliamentary engagement

Parliamentary oversight of export controls is provided through the Committees on Arms Export Controls (CAEC), with members from the Foreign Affairs, Defence, International Trade (which in early 2023 became the Business and Trade Committee), and International Development Committees.

In March, ECJU attended a private briefing between ECJU officials and the Committees at the Palace of Westminster, which served to further develop and advance our relationship with the Committees.

Since then, we have continued to engage with the Committees both in writing by providing detailed responses to queries raised by the Committees regarding arms export controls but also by attending regular check-in meetings with the Committees' clerks to share updates and information.

In HM Government's 9 January 2023 response to the CAEC's report "Developments in UK Strategic Export Controls", we committed to providing the Committees with 6 monthly updates on our new digital export licensing system, LITE. We have delivered on that commitment in 2023, both via the official briefings we have provided to the Committees, including the one in March, and in addition provided a written update on 29 August 2023 with further follow up information provided in September 2023 including an update on our work to improve transparency by way of the publication of the Official Statistics. We continue to be committed to keeping the CAEC's successor, the Business and Trade Select Committee, updated on the LITE IT system every 6 months.

We are keen to continue building upon the positive engagement we have established with CAEC and look forward to engaging with the Business and Trade Committee as the new parliamentary scrutiny committee with oversight of arms export controls.

5.2 Raising awareness of export licensing with industry and academia

During 2023, ECJU completed a programme of engagement with industry and academia to raise awareness of export controls and changes to legislation, to improve compliance and to facilitate responsible exports.

25 Notices to Exporters²¹ were published. Many were updates to the UK's sanctions regime in response to the invasion of Ukraine, but others alerted exporters to changes in legislation, procedures and actions taken by HMRC, including:

- amendments to OGELs
- amendments to Export Control Order 2008
- updated list of dual-use controlled items
- confirmation of electronic signatures on undertakings
- changes to the end user advisory service

ECJU participated in several trade, academia, defence and security exhibitions, including:

- The Security and Policing Home Office event, hosted by the Joint Security and Resilience Centre
- Defence and Security Equipment International
- Higher Education Export Control Association annual conference
- SAE Media Group's 'Defence Exports Conference'
- The Defence Procurement Research Technology and Exportability

ECJU also hosted its annual ECJU Symposium on 29 November 2023 in London, supported by trade associations and Other Government Departments, including HMRC; the FCDO; and the MOD. This attracted over 300 attendees and provided updates on UK export controls, as well as the ECJU LITE programme.

ECJU delivered 42 classroom-based courses aimed at improving industry awareness and compliance in export and trade controls. These were held in 13 locations across England and Scotland, including Southampton; Manchester; Newcastle; Aberdeen and London. The courses were an intermediate overview of the export control process, a licensing workshop and the 'Are My Items Controlled' workshop. These 3 courses were held over a 2-day period in each location. In total 1,006 delegates attended from 519 businesses.

The recorded webinars on GOV.UK²² were used as pre-course work for these classroom-based courses. The training bulletin²³ is published on the home page of ECJU on GOV.UK. The homepage provides access to all detailed guides; licensing tools; and notices to exporters.

As part of the transition to ECJU's new licensing platform LITE, ECJU has been working on making the necessary amendments to the GOV.UK web pages as well as developing guidance materials to support this transition.

ECJU continues to develop its engagement strategy, seeking more opportunities for peer-to-peer training with trade bodies, industry and academia through a variety of ECJU Awareness events, online platforms, exporter and association events and forums.

21 <https://www.gov.uk/government/collections/notices-to-exporters#notices-to-exporters-2023>

22 https://www.youtube.com/playlist?list=PLx8TFJYkqt4_8Mv364DJzTOUUKBdRDzju

23 <https://www.gov.uk/government/publications/export-control-training-bulletin>

ECJU also has representation on the board of the Export Control Profession²⁴ as a founding board member. The Profession has been developed in association with the Institute of Export and International Trade and promotes excellence in compliance with export and import controls and trade sanctions in the UK and globally.

5.3 Internet-based guides and licensing tools

Information about export controls is hosted on GOV.UK.²⁵ The ECJU home page includes links to all key guidance and tools to make applications and check control list entries. It also provides accessible links to the Notice to Exporters collection and statistical data.²⁶

Exporters can make use of the 2 web-based search tools which help to identify which products need a licence (the 'goods checker') and, if licensable, whether an OGEL potentially covers the proposed exports (the 'OGEL checker').

The goods checker tool provides an internet-based search function across the Consolidated UK Strategic Export Control Lists.²⁷

The OGEL checker assists users who know the rating (control list classification) of their goods and the destination for the proposed export to find out which OGEL(s) may cover the export, provided all the conditions can be met. Both tools can be accessed on SPIRE.

5.4 Advisory Services

The End-User Advisory Service

Exporters can use this service to request advice on whether ECJU has WMD or Military End-Use concerns (MEUC) related to specific organisations or persons with whom they wish to do business.

As it is a non-statutory advisory service there are no published targets for responses to End-User Advice enquiries. During 2023 ECJU received and responded to 12,970 enquiries, a marginal decrease from 13,550 enquiries in 2022. WMD and MEUC 'Concerns' letters were sent in 1,549 of cases in 2023, up from 1,155 in 2022.

This is in large part because of Russian sanctions, as well as the enhancement of the MEUC, which from May 2022 applied in respect of China.²⁸ Enquiries relating to China increased from 4,672 in 2022 to 4920 in 2023. MEUC concerns for China enquiries were raised in 188 cases between May and December 2022 and in 614 cases in 2023.

A Notice to Exporters (NTE2023/211) was published in November 2023 to provide exporters with additional guidance on when to submit enquiries.

24 <https://www.export.org.uk/export-control-profession/>

25 <https://www.gov.uk/government/organisations/export-control-joint-unit>

26 <https://www.exportcontroldb.trade.gov.uk/sdb2/fox/sdb/SDBHOME>

27 <https://www.gov.uk/government/publications/uk-strategic-export-control-lists-the-consolidated-list-of-strategic-military-and-dual-use-items-that-require-export-authorisation>

28 <https://www.gov.uk/government/publications/notice-to-exporters-202217-military-end-use-controls-update/nte-202217-military-end-use-controls-update>

Section 6:

HM Government support to Allies and Partners

6.1 Gifting

The term 'gifting' is applied to the donation of any export-controlled equipment by HM Government to a foreign government in support of its wider security and foreign policy aims. For financial and accounting purposes the donation might be classed as a gift; a grant-in-aid; or grant-in-kind, depending on whether the export is a surplus asset; has been purchased specifically to achieve a strategic aim; or has been funded from a departmental budget or centrally held funds. In the context of this report however, the generic term 'gifting' is applied to all donations by HM Government of export-controlled equipment.

In 2023, 4 applications to gift equipment (to countries other than Ukraine, which is covered in Section 7) were approved. One application, to the Dominican Republic, was in pursuit of the aims established by the Conflict, Stability and Security Fund (CSSF). The CSSF provides development and security support to countries which are at risk of conflict or instability, using both Official Development Assistance (ODA) and non-ODA spend to deliver and support security, defence, peacekeeping, peacebuilding and stability activity. Through the CSSF, the UK and our international partners are more secure from threats such as terrorism, corruption and illegal migration or trafficking.

All proposals to gift controlled military equipment and dual-use equipment, including gifts funded through the CSSF, are assessed on a case-by-case basis against the Criteria, in the same way as commercial applications and with the same degree of rigour. The MOD manages the assessment process and seeks advice on gifting proposals from advisers in the MOD and the FCDO.

Where gifts of controlled military equipment are approved these are exported under a Crown Exemption letter. As a result, they do not require an export or trade licence. In the case of gifts of dual-use items (including software and technology), export licence coverage must be in place prior to using the open licence for the export of dual-use goods by the Crown.

Gifts exceeding £300,000 in value are notified to Parliament before the gift is made.

Table 6.1* Gifted controlled equipment in 2023

Country	End-User	Goods Description	Sponsoring Department	Approx. Value £
Australia	Australian War Memorial	2 x SA80 L85A2 rifles with associated rails, bipods, slings, magazines, and sights	Ministry of Defence	1,330
Dominican Republic	Law Enforcement	4 x dual-use imaging cameras	Home Office	8,200**
Libya	Libyan Hydrographic Service	Hydrographic survey equipment including computers and peripherals	Ministry of Defence	300
Moldova	Law Enforcement	120 each of: military helmets; plate carriers with ballistic plates; eye protection (glasses); gloves; knee and elbow pads	Foreign, Commonwealth & Development Office	76,400

* This table refers to equipment assessed and approved to be gifted by HM Government to nations other than Ukraine. It does not contain definitive information on equipment delivered. Data is based on Management Information records as of 25 March 2024.

** Equipment purchased through the CSSF.

With reference to the gift to Libya, the UK interprets the UN arms embargo for Libya as prohibiting the export of any military goods or technology and prohibiting the export of any goods or technology that could be used for internal repression, respectively. These items to support hydrographic surveying for the purpose of maritime safety are considered out of scope of the embargo.

6.2 Government to Government Exports

The Defence Equipment Sales Authority (DESA) of the MOD may dispose of certain military equipment that is surplus to the requirements of the UK Armed Forces. These disposals are subject to licensing controls. Tables 6.2 and 6.3 list these exports delivered in 2023 by destination, equipment type and quantity. These tables detail equipment that has been exported only. It does not include equipment that the MOD has sold and not yet exported.

Table 6.2* Disposals to foreign armed forces

Country	Type of Equipment	Quantity
Australia	Hellfire Missiles	150
Australia	Type B Recompression Chambers	2
Netherlands	Sonar Buoys	170
Romania	Former HMS Blythe and HMS Pembroke Minehunter Ships	2
Australia	WAH-64 Apache Helicopter	1
Chile	E3D Sentry Spares	35,589

* Data is based on Management Information records as of 22 March 2024

Table 6.3* Other overseas transfers to commercial entities

Country	Type of Equipment	Quantity
USA	E3D Sentry Spares	680
France	Antenna Radar	1
Turkey	Former RFA Diligence Repair Ship	1

* Data is based on Management Information records as of 22 March 2024

In addition to DESA, the MOD Defence Equipment and Support established an Export Portfolio Management Office (PMO) in July 2023 to coordinate a wider remit of government-to-government exports outside of disposals. This includes requests for in-service equipment, joint collaboration programmes or assistance in working with the UK defence industry to develop bespoke capabilities. The PMO is currently working to secure a number export opportunities with several countries.

6.3 Government to Government Projects

The UK has a longstanding government-to-government defence cooperation programme with the Kingdom of Saudi Arabia, under which the UK has provided Typhoon, Tornado, and Hawk aircraft, mine countermeasure vessels, and associated munitions, infrastructure, logistics and manpower support packages.

The UK continued to provide substantial support under projects supported by the Ministry of Defence Saudi Armed Forces Project, for Hawk, Tornado, Typhoon and Pilatus in-service aircraft, and their associated systems. No offensive munitions were exported.

All goods were exported under export licences obtained by industry. Where a SIEL was issued, the data is included in the corresponding Strategic Export Controls Quarterly Reports.

Section 7:

International Issues

7.1 Ukraine

The UK continues to be at the forefront of supporting Ukraine to respond to Russia's illegal full-scale invasion of its territory. In addition to diplomatic support, HM Government has provided Ukraine with significant military aid, both lethal and non-lethal, to ensure it is able to defend itself from Russia's ongoing barbaric attacks. While Ukraine is fighting to regain its sovereign territory, it is also fighting to reinforce peace, democracy and security in the rest of Europe.

HM Government is continuing to supply Ukraine with vital military equipment through multiple routes, namely:

- UK defence stocks
- rapid procurement from UK and overseas defence industries
- purchasing surplus equipment from foreign governments which has then been gifted by HM Government
- coordinated international procurement including through the UK-led International Fund for Ukraine and capability coalitions.

Recognising the UK as a major exporter of defence equipment, UK Defence and Security Exports in DBT has played a vital liaison role to ensure UK industry is well placed to support Ukrainian requirements and is working to build commercial relationships between the UK and Ukrainian defence industries, supported by the MOD.

As the licensing authority for strategic export controls, the DBT team in ECJU have administered all licence applications to Ukraine from UK Industry, providing military equipment as part of the rapid procurement for the end-use of the Ukrainian Armed and Security Forces, and treated these as priority cases.

The MOD team within ECJU are responsible for managing gifting applications from HM Government, providing assessments and seeking advice from advisory departments, such as the FCDO and have treated the gifting applications for Ukraine as a priority.

The MOD carefully calibrates all potential gifted equipment against the current context on the ground in Ukraine, ensuring that equipment can be both received and used by the Armed Forces of Ukraine for the purpose of defending and regaining their sovereign territory. End-User Undertakings have been provided by the Ukrainian Armed Forces upon receipt of controlled goods.

HM Government is steadfast in its commitment to continue to supply military assistance and the UK will stand shoulder to shoulder with Ukraine for as long as it takes.

The MOD gifted the following controlled equipment to the Government of Ukraine in 2023²⁹:

- more than 300 air defence systems, and approximately 1,000 short and medium range surface-to-air missiles
- thousands of anti-armour weapons
- dozens of artillery systems, and more than 200,000 artillery rounds
- 14 main battle tanks (Challenger 2), and thousands of rounds of ammunition
- thousands of items of surveillance and targeting equipment
- more than 200 armoured vehicles / protected mobility / logistic support vehicles
- 1 Sea King Helicopter
- thousands of units of communication and SATCOMS equipment
- thousands of electronic warfare and GPS systems
- thousands of items of clothing, carriage and sleeping systems, PPE (personal protective equipment) (helmets, ballistic vests etc) and medical equipment
- more than 50 generators, and over 100km of expeditionary barriers and bridging capabilities
- more than 1,000 uncrewed systems
- more than 10,000 spare parts, tools and support kits
- approximately 40,000 small arms, and approximately 8 million rounds of ammunition
- Storm Shadow long range missiles

7.2 Israel

Following Hamas's attack on Israel on 7 October 2023, and the Israeli military response, a robust process was put in place to ensure the careful and continual review of export licences for Israel. This started with a Change in Circumstances (CiC) Review. This process requires ECJU to assess the licensing situation following a significant change in circumstances in a particular country or region, such as the outbreak of a new armed conflict, which might affect compliance with the Strategic Export Licensing Criteria.

As part of the CiC Review, a stocktake of all extant licences was initiated. In considering licences, officials were able to draw upon a range of public and non-public sources and specialist experts. They also considered open-source material and wider reporting that demonstrated how different platforms were being utilised.

²⁹ Most quantities of gifts are given in approximate figures to protect operational security. Data is based on Management Information Records as of 2 May 2024.

At the same time as the CiC Review was underway, the FCDO established an international humanitarian law (IHL) Compliance Assessment Process for assessing on an ongoing basis Israel's commitment and capability to comply with IHL, and its record of compliance with IHL. The assessment process gathers information from a wide range of sources, including: reporting from NGOs on the ground; reports from other FCDO desks and from Posts; reporting in the media; statements from the UN, NGOs and other organisations; and reporting from HMG engagement with Israeli counterparts. This methodology is primarily intended to inform the application of Criterion 2c of the Strategic Export Licensing Criteria. Reviews are provided to Ministers on a regular basis, allowing them to decide whether or not to suspend or revoke relevant licences.

Following a review of Israel's conduct in the Gaza conflict, which concluded there is a clear risk that UK export items might be used to commit or facilitate serious violations of IHL, on 2 September 2024 HM Government announced the suspension of certain export licences to Israel.

Section 8:

UK and International Policy developments

8.1 Office of Trade Sanctions Implementation (OTSI)

In December 2023, HM Government announced the creation of OTSI to strengthen the implementation and enforcement of trade sanctions. While taking the lead on the implementation of trade sanctions, OTSI is bringing together key functions, such as issuing licences to enable businesses to conduct trade in services in line with sanctions as well as outreach and issuing guidance to help UK businesses be confident that they are complying with UK trade sanctions. OTSI became operational on 10 October 2024 with new civil enforcement powers. These powers complement the existing powers HMRC has in relation to the enforcement of trade sanctions, including on the import and export of sanctioned goods. OTSI leads on the civil enforcement of services sanctions and has the power to enforce breaches of trade sanctions where UK persons or companies are involved in moving goods or services to sanctioned destinations via third countries.

8.2 Military End-Use Control (MEUC) Review

On 19 May 2022, the UK enhanced the MEUC to allow us to better address emerging threats to national security, international peace and security, and human rights arising from the use of non-listed items by the military, police or security forces, or entities acting on their behalf, in embargoed destinations.

During 2023, ECJU began a review of the operation of the MEUC, looking at its effectiveness in preventing exports of concern, as well as the impact its introduction has had on both the licensing process and affected UK exporters.

The review has concluded but our plans to publish the results and engage with affected businesses on the findings were put on hold because of the 2024 General Election. We are now preparing to consult new Ministers on the impact and consequences of this new control and on a decision to publish a summary of the outcomes of the review.

8.3 Emerging Technologies Review

The 2023 UK Integrated Review Refresh committed to consulting on updating the export control regime to tackle sensitive emerging technology transfers, and work with international partners to make multilateral controls more effective.

To address this commitment, we undertook an extensive review to assess whether our export control regime was keeping pace with emerging technologies of critical interest to the UK from the perspective of national security and human rights.

The review considered emerging technologies drawn from the list of sectors subject to mandatory notification³⁰ under the National Security and Investment Act 2021.

Plans for publishing the results and engaging with business on the findings were put on hold because of the 2024 General Election. We will be putting advice to new Ministers on the outcome and next steps.

8.4 Arms Trade Treaty (ATT)

The ATT is the only legally-binding, international, conventional arms control treaty. It seeks to establish the highest possible common international standards for regulating the global trade in conventional arms. The UK ratified the ATT on 2 April 2014; it entered into force on 24 December 2014. On 31 December 2023, the Treaty had 113 States Parties.

The UK has continued to play a leading role in the ATT. The Voluntary Trust Fund³¹ Selection Committee approved 12 projects for funding in the 2023 project cycle, aimed at supporting effective Treaty implementation. The UK used its role as Chair of the Selection Committee to ensure transparency in the selection process and improving outreach on the application process to ensure that quality of application is improved. The UK committed £30,000 to support outreach efforts.

The UK supports universalisation of the ATT and continued to lobby potential States Parties to encourage them to accede to the Treaty and offering support to States considering accession.

The UK also encouraged major arms exporters and importers to align with important principles of the ATT, expanding the positive influence of the Treaty beyond its immediate membership. The UK submitted its annual report to the Secretariat. This report covers authorised or actual exports of conventional arms covered under Article 2(1) of the Treaty during the calendar year. Although the UK does not collate comprehensive data relating to the import of all goods covered by the ATT, the UK did, for the first time, report on a small number of imports.

8.5 Small Arms and Light Weapons (SALW)

Preventing SALW falling into the hands of terrorists, organised criminals, and other unintended recipients, including through strong and effective multilateral instruments, remains a UK priority. The UK has remained active in international efforts to prevent the illicit trade and diversion of SALW and their ammunition.

The UK remains a strong supporter of the UN Programme of Action (PoA) to Prevent, Combat and Eradicate the Illicit Trade in Small Arms and Light Weapons in All its Aspects and the International Tracing Instrument. As the only globally accepted politically binding agreements on SALW, they provide a common set of standards for establishing effective national controls over the full lifecycle of small arms and light weapons, from production, transfer, possession, and storage to eventual disposal. In addition, they promote law enforcement cooperation in order to disrupt illicit trafficking networks. The UK also supports implementation of relevant technical guidelines

30 [National Security and Investment Act: details of the 17 types of notifiable acquisitions – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/national-security-and-investment-act-2021)

31 <https://thearmstradetreaty.org/voluntary.html>

in the management of SALW and their ammunition, including the Modular Small Arms Control Implementation Compendium, the International Ammunition Technical Guidelines and through the Organisation for Security and Co-operation in Europe (OSCE).

The 4th Review Conference of the PoA took place in June 2024. HM Government regularly reports on the UK's implementation of international instruments to promote transparency and for confidence-building. Previous and current UK national reports are published and available at:

- <https://smallarms.un-arm.org/national-reports/>
- <https://www.unroca.org/>
- <https://thearmstradetreaty.org/annual-reports.html>

HM Government has funded capacity-building projects³² to support the universalisation and implementation of global arms control and counter-proliferation norms, treaties, and obligations. The UK also supports projects to reduce illicit flows and the destabilising accumulation of SALW and their ammunition. These projects have been funded through the Counter-Proliferation Programme Fund³³ and the CSSF, both bilaterally and through multilateral trust funds such as the NATO Partnership for Peace Trust Fund and the OSCE SALW Assistance Mechanism.

8.6 Open Ended Working Group (OEWG) on Conventional Ammunition

In response to the Group of Government Experts report on problems arising from the accumulation of conventional ammunition stockpiles in surplus, UN General Assembly Resolution 76/233 established an OEWG on Conventional Ammunition to elaborate a set of political commitments in this area.

The OEWG on Conventional Ammunition met, in New York, between 13 and 17 February 2023 and, between 5 and 9 June 2023, the UK participated in both sessions. The OEWG was able to agree, by consensus, establishing a politically binding and comprehensive framework to support safe, secure, and sustainable through-life ammunition management at the national, sub-regional, regional, and global levels, building upon and complementing existing frameworks.

The new framework was approved by First Committee and will meet for the first time for a Preparatory Meeting in 2025.

8.7 Convention on Certain Conventional Weapons (CCW)

The CCW aims to prohibit or restrict the use of conventional weapons deemed to cause unnecessary suffering or to have indiscriminate effects, including weapons with non-detectable fragments, mines, booby-traps, incendiary weapons, and blinding laser weapons.

The Convention itself contains only general provisions, with annexed Protocols – a structure adopted to allow flexibility and the inclusion of other types of conventional weapon in the future. Prohibitions or restrictions on the use of specific weapons or weapon systems are contained in 5 Protocols, which cover:

³² <https://www.gov.uk/government/publications/official-development-assistance-oda-fcdo-international-programme-spend-objectives-2020-to-2021>

³³ <https://www.gov.uk/government/publications/counter-proliferation-programme>

- Protocol I – Non-Detectable Fragments
- Protocol II – Mines, Booby Traps and Other Devices (Amended)
- Protocol III – Incendiary Weapons
- Protocol IV – Blinding Laser Weapons
- Protocol V – Explosive Remnants of War

The Convention with 3 annexed Protocols (I, II and III) was adopted on 10 October 1980 and entered into force on 2 December 1983. Protocol IV and Amended Protocol II entered into force in 1998. Protocol V entered into force in 2006. The UK ratified Protocols I, II and III on 13 February 1995, and Amended Protocol II and Protocol IV on 11 February 1999. HM Government began the process of ratifying Protocol V late in the year and ratified on 13 May 2024.

The UK attended the CCW annual conferences for Protocols V and II on the 13 and 14 November 2023 respectively, as well as the Meeting of High Contracting Parties between 15 and 17 November 2023.

The meetings were heavily disrupted by Russia who blocked consensus on the rules of procedure. The UK's announcement of impending Protocol V ratification was warmly received as well as a new mandate established for the Lethal Autonomous Weapon Systems Group of Governmental Experts. The new mandate agreed to 'formulate, by consensus, a set of elements of an instrument'.

8.8 Anti-Personnel Mine Ban Convention (the 'Ottawa Convention')

Anti-personnel mines (APMs) continue to cause death, injury, and wider suffering in many parts of the world and damage efforts to achieve sustainable development goals.

The Ottawa Convention was adopted on 18 September 1997.³⁴ It entered into force for signatory states, including the UK, on 1 March 1999. There are 164 States Parties to the Convention that ban the use, stockpiling, production, and transfer of APMs.

The UK attended the Convention's 21 Meeting of States Parties from 20 to 24 November 2023, as well as the Intersessional meeting from 19 to 21 June 2023. The Conference reviewed progress against the Convention's Articles, and against the goals set out in the 2019 Oslo Action Plan. The Oslo Action Plan's goals include universalisation of the Convention, stockpile destruction, mine clearance, mine risk education, victim assistance, and international cooperation and assistance.

The UK remains committed to mine action through its support to countries where the clearance of landmines, cluster munitions and other explosive remnants of war contributes significantly to relieving the suffering of some of the world's most disadvantaged communities.

The UK's Global Mines Action Programme cleared and confirmed safe over 16.5 million square metres of land and delivered risk education messages to over 430,000 people living in mine-affected communities by the close of the year. The UK's CSSF contributed over £3.5m to stockpile destruction, clearance, risk education, victim assistance and advocacy, within mine action. It carried this out in Ukraine, Azerbaijan, Sri Lanka, Yemen, Libya, Somalia, Kenya, Ghana, Nigeria, Pakistan and cross-border regions.

34 <https://www.apminebanconvention.org/en/the-convention/history-and-text/>

Regarding the US announcement of transfers of anti-personnel landmines to Ukraine, the UK's commitment to the Convention is absolute and UK legislation on international military operations and anti-personnel mines is clear, and contained within the UK Landmines Act 1998, section 5. The UK continues to provide vital support to Ukraine to ensure it is able to defend itself from Russia's ongoing barbaric attacks in-line with Convention obligations. The UK does not comment publicly on the specifics of operational weapons transfers to Ukraine.

8.9 Convention on Cluster Munitions (the 'Oslo Convention')

Cluster munitions can have a devastating humanitarian impact on civilian populations, both at the time of use and subsequently. Unexploded sub-munitions can threaten the lives of civilians and affect post-conflict reconstruction and development for years afterwards.

In 2008, several governments, including the UK, established the Convention on Cluster Munitions (CCM), which prohibits the use, development, production, acquisition, stockpiling, and transfer of cluster munitions.³⁵ The UK became the 32nd State Party to the CCM in 2010. Nigeria's ratification and South Sudan's accession to the Convention mean there are now 112 States Parties.

The CCM's eleventh Meeting of States Parties took place between 11 and 14 September 2023, where the issue of US-transferred cluster munitions to Ukraine was discussed. The UK delivered several statements in support of the CCM and highlighted Article 21 of its text which outlines the rules around interoperability between States Parties and States not party.

The UK remains committed to the CCM and held the Presidency of the CCM most recently in 2022, leading work to strengthen both its implementation and universalisation across all regions.

As a State Party to the CCM, the UK has obligations including not to use, develop, produce, otherwise acquire, stockpile, retain or transfer to anyone, directly or indirectly, cluster munitions. We have discussed our obligations with both the US and Ukraine. Neither the US nor Ukraine have signed the Convention and therefore may use cluster munitions within the grounds of international law. The UK may operate militarily with allies in accordance with the object and provisions of the Convention.

8.10 UN Register of Conventional Arms (UNRoCA)

The UNRoCA is a voluntary reporting instrument, intended to create greater transparency in international arms transfers and help identify excessive build-up of arms in countries or regions. The Register was established in 1991; the UK has reported to the UNRoCA since its inception. The UN Register currently covers 7 categories of conventional weapons:

- battle tanks
- armoured combat vehicles
- large-calibre artillery systems
- combat aircraft
- attack helicopters
- warships (including submarines)
- missiles and missile-launchers (including Man-Portable Air Defence Systems)

35 <https://www.clusterconvention.org/>

It also includes an additional '+1' category covering small arms and light weapons. The UK submits an annual report to the UN Register on all exports of military equipment in these categories, including small arms and light weapons. The UK report also includes information on procurement through national production and military holdings. HM Government actively encourages all UN Member States to make reports with similar levels of transparency. Transparent systems, underpinned by strict export controls, are less vulnerable to exploitation and manipulation. Previous and current UK national reports are available here: <https://www.unroca.org/>

8.11 Nuclear Suppliers Group (NSG)

The NSG³⁶, which was established in 1974, seeks to prevent the proliferation of nuclear weapons through the adoption into national export controls guidelines on the transfer of nuclear and nuclear-related material, dual-use material, equipment, software, and technology. The NSG Guidelines are not intended to hinder international cooperation on peaceful uses of nuclear energy and instead allow states to trade with confidence; the NSG also promotes effective safeguards and the physical protection of existing nuclear materials. The NSG in 1994 adopted into the Guidelines the "Non-proliferation Principles" whereby a supplying country, notwithstanding any other provisions in the NSG Guidelines, will only authorise a transfer when satisfied that the transfer would not contribute to the proliferation of nuclear weapons.

The NSG Guidelines are consistent with, and complement, the various international, legally binding nuclear non-proliferation instruments. These include the Treaty on the Non-Proliferation of Nuclear Weapons (NPT), the Treaty for the Prohibition of Nuclear Weapons in Latin America (Treaty of Tlatelolco), the South Pacific Nuclear-Free-Zone Treaty (Treaty of Rarotonga), the African Nuclear-Weapon-Free Zone Treaty (Treaty of Pelindaba), the Treaty on the Southeast Asia Nuclear-Weapon-Free Zone (Treaty of Bangkok), and the Central Asian Nuclear-Weapon-Free Zone Treaty (Treaty of Semipalatinsk).

As of December, there were 48 Participating Governments with the European Commission and the Chair of the Zangger Committee participating as observers.

The NSG held its Consultative Group meetings in Vienna (24 to 25 April 2023 and 27 to 28 November 2023); and Buenos Aires (10 to 11 July 2023) and its Plenary in Buenos Aires (12 to 14 July 2023). The Group also held technical meetings in Vienna (26 to 28 April 2023, and 29 November to 1 December 2023) on technical issues important to the implementation of the Control Lists and updating the NSG Guidelines to keep pace with the evolving global security landscape and a fast-paced nuclear and nuclear related industry.

The Group continued to exchange information on global proliferation and reiterated its firm support for the full, complete, and effective implementation of the NPT as the cornerstone of the international non-proliferation regime. The Group reconfirmed its commitment to UN Security Council Resolutions, including UNSCR 1540 in respect to the establishment of effective export control as an international obligation under the resolution.

36 <https://www.nuclearsuppliersgroup.org/index.php/en/>

8.12 Zangger Committee

The Zangger Committee³⁷, also known as the NPT Exporters Committee, consists of 39 states, which, since 1971, has the remit to serve as the “faithful interpreter” of Article III, paragraph 2, of the NPT to harmonise the interpretation of nuclear export control policies for NPT Parties regarding what is meant in the article by “especially designed or prepared equipment or material for the processing, use or production of special fissionable material”. The Zangger Committee maintains a trigger list (triggering safeguards as a condition of supply) of nuclear-related strategic goods to assist NPT Parties in identifying equipment and materials subject to export controls. The Zangger Committee trigger list forms the basis of the NSG Trigger List.

The UK, through the UK Permanent Mission to the UN in Vienna, acts as the secretariat for the Zangger Committee.

The Zangger Committee held its annual meeting in Vienna on 28 November 2023. The Committee continued to review the trigger list in light of parallel developments in the NSG to ensure alignment and agreed an interim update to the list published on the Committee’s public website.

8.13 Australia Group (AG)

The AG³⁸ is an informal forum of 42 states and the European Union which seeks to ensure, through the harmonisation of export controls, that exports do not contribute to the development or proliferation of chemical and biological weapons. Co-ordination of national export control measures assists AG participants in fulfilling their obligations under the CWC and the Biological and Toxin Weapons Convention.

The AG met in Paris in June 2023 for 3 days of technical and enforcement meetings followed by 2 days of plenary. The meetings comprised of the New and Evolving Technologies Technical Experts’ Meeting, Enforcement Exchange meeting, and the Implementation Meeting. During the meetings, members exchanged information on enforcement activities and reviewed implementation. Participants discussed tightening controls on exports of sensitive dual-use goods and technologies to Russia in light of their ongoing aggression against Ukraine and explored ways to further coordinate activities in furtherance of non-proliferation objectives. The AG adopted the public statement with clear, strong language on Ukraine and Syria.

AG members shared approaches for keeping pace with rapidly evolving dual-use technologies and discussed the relevance of some of these technologies for non-proliferation and export control. Participants exchanged best practices to mitigate risk associated with dual-use research of concern.

8.14 Missile Technology Control Regime (MTCR)

The MTCR³⁹ is a politically binding instrument, formed in 1987. As of 31 December 2023, the MTCR had 35 partner countries, working together to prevent the proliferation of unmanned delivery systems capable of delivering WMD by coordinating national export licensing efforts. The UK is a founding member and plays a leading role, including as part of the MTCR’s Technical and Law Enforcement Experts Groups.

³⁷ <http://zanggercommittee.org/>

³⁸ <https://www.dfat.gov.au/publications/minisite/theaustraliagroupnet/site/en/index.html>

³⁹ <https://mtcr.info/>

The MTCR guidelines and lists of controlled items form an international benchmark for controlling exports of missile-related items and technologies.

The MTCR plenary and subgroup meetings were held in Rio de Janeiro, Brazil. The Brazilians assumed the chair from Switzerland, the Technical Experts and Technical Outreach meeting was hosted by Norway. The UK was represented at all meetings and delivered presentations on technical, enforcement and MTCR policy issues. The UK conducted bilateral and multilateral meetings in the margins of the MTCR plenary to discuss MTCR policy with partners.

8.15 Wassenaar Arrangement (WA)

The WA⁴⁰ was established to contribute to regional and international security and stability by promoting transparency and helping to prevent destabilising accumulations of conventional arms and associated sensitive dual-use goods and technologies. The WA was established on 19 December 1995 by 28 Participating States, including the UK. As of 31 December 2023, the WA had 42 Participating States.

WA Control Lists, which underpin the arms export control regimes of all Participating States (as well as many non-participating states), are the WA's most important contribution to global security. The WA produces 2 Control Lists – one for conventional weapons (the Munitions List) and one for dual-use goods and technologies. Participating States report exports of controlled arms, goods, or technology to non-members every 6 months.

All WA meetings progressed without disruption this year and 33% of the list review proposals were agreed. The UK was represented at all meetings and delivered presentations. HM Government conducted bilateral meetings in the margins of the Wassenaar Arrangement plenary, and multilaterally to discuss WA policy with partners.

8.16 The G7 Global Partnership Against the Spread of Weapons and Materials of Mass Destruction (GP)

The GP⁴¹ was created to address and mitigate the regional and global threat from chemical, biological, radiological, and nuclear (CBRN) weapons and related materials. Established at the 2002 Kananaskis G8 Summit, the G7-led GP has proven itself to be the primary international WMD threat reduction programme mechanism. 30 member states, plus the EU, are active in the GP. The GP CBRN Working Group, one of 4 working groups, covers activities relating to UNSCR 1540⁴² and other export control relevant mechanism to prevent the access to WMD technology and materials by non-state actors and terrorists.

The UK continued funding to develop the Non-Proliferation and Strategic Trade Controls Knowledge Hub. Originally designed for use by GP members, this year accessibility was expanded to make it a freely available public resource. The Hub is now helping to strengthen the implementation of export controls, by giving states access to a range of useful resources such as best practice and case studies. Early feedback highlights use by broad range of actors:

- in Ukraine, use of the Hub is strengthening best practice for dual-use items

40 <https://www.wassenaar.org/genesis-of-the-wassenaar-arrangement/>

41 <http://www.gpwmd.com/>

42 <https://www.un.org/disarmament/wmd/sc1540/>

- scientists, academics and researchers lacking best practice information are now using the Hub to develop internal compliance policies
- in the Baltics, use of the Hub is strengthening national measures for dual-use items (under Wassenaar) – the Lithuanian Sanctions Office and the national licensing authority, and customs authorities in Latvia and Estonia are using the hub to develop screening systems to prevent the shipment of items to Iran and Russia
- and in India, the Hub is helping companies (emerging tech area) strengthen export controls compliance – small and medium-sized firms that lack internal resources are now using the Hub to understand national export controls and implement appropriate measures

The Hub can be accessed via <https://www.gpwmd.com/gp-hub>.

8.17 Academic Technology Approval Scheme (ATAS)

HM Government's ATAS was introduced in November 2007. It seeks to protect sensitive scientific and engineering-based technologies relating to advanced conventional military technology, WMD and their means of delivery, from misappropriation.

ATAS operates with the cooperation of UK higher education institutions. Overseas students from outside the European Economic Area, Switzerland, the United States, Australia, Canada, New Zealand, Singapore, the Republic of Korea and Japan wishing to study or research an established set of sensitive subjects must first obtain an ATAS certificate before applying for a visa or commencing research. The applicant makes an application online at no cost.

The number of applications remained similar to the previous year. ATAS approved 32,845 applications, of which 27,595 were students and 5,250 researchers. Clearance was denied on 1,683 occasions, of which 1,237 were students and 446 researchers⁴³.

8.18 International outreach

The UK engaged in various in-person international outreach activities throughout the year. Both the Southeast Asian Forum on Export Controls and Asian Export Control Seminar, hosted in Kuala Lumpur and Tokyo in October and February respectively, were attended by HM Government personnel. The UK conducted MTCR outreach in May, in both Singapore and Malaysia. Experts also contributed to the MTCR's Technical Outreach Meeting for non-regime members which took place in Oslo during June.

The UK hosted a workshop on the CCM, the Oslo Convention, with Commonwealth states at the Queen Elizabeth II Conference Centre in London in March. The same month, the UK Ambassador and Permanent Representative to the Conference on Disarmament in Geneva visited Malaysia, Indonesia, and Thailand, to promote the universalisation of the Convention. Officers from the UK's Counter Proliferation and Arms Control Centre also visited Azerbaijan in April, to discuss a pathway towards accession to the respective Conventions on anti-personnel landmines and cluster munitions.

The UK attended the G7's GP CBRN Working Group meetings in Rome and Nagasaki during February and October respectively.

⁴³ Data is based on management information records as of 31 December 2023.

The UK attended the AG outreach session in February in Rome, which took place during AG Intersessional Meeting. AG members were joined by Albania, Jordan, Montenegro, and North Macedonia. The UK delivered a presentation on the challenges of preventing chemical and biological weapons proliferation.

The UK regularly engages with key international partners, both in governments and academia, regarding ATAS and more broadly concerning research security where relevant to export controls.

Section 9:

Compliance and enforcement

9.1 Compliance

ECJU carries out evidential compliance inspections at the sites of companies and individuals that hold Open Individual or Open General Licences, Standard Individual Licences where electronic transfers arise, and licences for trafficking and brokering. The aims of this activity are to:

- provide assurance to HM Government that all licence holders are meeting the terms and conditions of their licences
- raise awareness of export controls within businesses and their employees. This is particularly important for those new to export controls

ECJU's Compliance Unit undertakes 3 types of scheduled contact with exporters:

- 1) First compliance contact: with the aim to conduct this within 6 months of the first registration with, or issuance of, the licence(s)
- 2) Routine compliance inspections: Regular checks at a frequency determined by risk assessment and/or changes in circumstances, such as a business take-over or change in key staff
- 3) Revisits: where a company has been found non-compliant at a previous compliance inspection. ECJU aims to revisit these sites within 6 to 8 months of the previous visit

The Compliance Team use 4 predefined criteria, agreed with HMRC, to determine the level of compliance and to ensure a consistent approach.

The 4 pre-defined criteria are:

- 1) Compliant: where all documentation is fully in order.
- 2) Generally compliant: where minor errors (for example, typographical) are identified on undertakings and/or licence identifiers on documentation.
- 3) Not fully compliant: where repeated minor administrative errors are identified or a substantive error is identified in one of multiple shipments; and/or an incorrect licence was quoted, where another extant licence held by the exporter permitted the export.

- 4) Non-compliant: where significant errors have been identified such as incorrect use of licences; goods or destinations not permitted; or a failure to obtain prerequisite permissions and/or undertaking prior to export/transfer. Serious or repeated non-compliance may lead to open licences being withdrawn. All instances of non-compliance are reported to HMRC.

UK-based businesses are usually subject to on-site compliance inspections as these provide greater efficiency and scrutiny. Where onsite inspections were not viable, or if more practical for follow up action, remote inspections were undertaken via video calls.

We intend from 2024 to record first contact with holders of relevant licences, short of an inspection, normally within 6 months of their first registration. This is to assess their knowledge of the controls and licences they hold, what training and awareness they may need, or if a compliance inspection visit is appropriate to facilitate responsible exports.

Businesses whose operations are based overseas continued to be subject to remote compliance inspections for trade or trafficking and brokering activities. Such licence holders do not usually export tangible exports. In these cases, the business is required to send to the ECJU Compliance Inspector for review a log of its activities and any supporting information or documentation required by the licence utilised.

In 2023 the Compliance Unit has been focusing on priority sites to visit, including those that had not had an inspection for a number of years. Tables 9.1 to 9.3 show compliance levels for sites inspected in 2023. Information for 2022 and 2021 is also provided for comparative purposes.

Out of a team of 8 inspectors, the Compliance Team carried 4 vacancies into 2023 but was successful in recruiting into 3 of the posts. The focus for 2023 was to maintain priority targeted and intelligence led audits, as well as training the new inspectors alongside experienced officers on the more routine visits. This is reflected in the reduction of compliance checks undertaken during 2023.

Table 9.1* Compliance checks

Outcomes	2023	2022	2021
Number of compliance checks undertaken	244	377	519

* Data is based on management information records as of 17 April 2024.

Table 9.2* Compliance checks – substantive infractions

Outcomes	2023	2022	2021
Number of warning letters	42	54	81
Number of suspensions	1	1	5

* Data is based on management information records as of 17 April 2024.

The Compliance Team issued 42 warning letters for non-compliant outcomes to company directors during 2023, where breaches of licence conditions were identified. Exporters with licences that did not cover their goods or exports were recommended to surrender the licences. This removes the risk of becoming non-compliant by using these licences in error. One exporter had a licence suspended due to repeat infractions.

The reasons for a non-compliant outcomes in 2023 fell into 5 broad categories:

- no valid undertakings
- exports to non-permitted destinations
- exports of non-permitted goods/items
- no valid MOD approvals
- no valid export licence in place

Table 9.3* Compliance checks – compliance

	2023	2022	2021
% of first compliance checks	% (count)	% (count)	%
Compliant	36% (17)	62% (23)	55%
Generally compliant	34% (16)	11% (4)	13%
Not fully compliant	15% (7)	11% (4)	12%
Non-compliant	15% (7)	16% (6)	20%
% of routine compliance checks			
Compliant	33% (53)	39% (90)	48%
Generally compliant	30% (48)	21% (48)	18%
Not fully compliant	15% (25)	20% (45)	15%
Non-compliant	22% (35)	20% (45)	19%
% of revisits			
Compliant	75% (27)	68% (76)	65%
Generally compliant	17% (6)	14% (16)	11%
Not fully compliant	5% (2)	10% (11)	10%
Non-compliant	3% (1)	8% (9)	14%

* Data is based on management information records as of 17 April 2024.

9.2 Enforcement activity undertaken by HMRC, Border Force and the UK prosecution authorities

HMRC continued to work with Border Force and UK prosecuting authorities⁴⁴ to undertake a wide range of enforcement activity throughout 2023. This activity included:

- 266 seizures of sanctioned and strategic goods. These are cases where goods were presented for export and found to be in breach of licensing requirements or sanctions and embargoes (see Table 9.5)

⁴⁴ Crown Prosecution Service (CPS in England and Wales); the Crown Office and Procurator Fiscal Service (COPFS in Scotland); and the Public Prosecution Service (PPS in Northern Ireland)

- 128 end-use cases, where non-listed items were stopped from leaving the UK and brought within export controls. This control is used if there is a risk that the goods would be put to an illicit military or WMD end-use
- HMRC issued 9 compound settlements totalling £2,276,390.77 for unlicensed exports of military goods, dual-use goods and sanctioned goods and related activity
- 216 HMRC warning letters issued as a result of voluntary disclosures
- there were 3 positive charging decisions by prosecuting authorities for cases that are pending trial, but no convictions in 2023

HMRC assesses all breaches of arms export controls and sanctions. Where serious and/or deliberate breaches of the controls are identified, or where there are aggravating features, cases will be adopted for criminal investigation. These cases will be investigated and, if appropriate, referred to the relevant prosecuting authority to determine a) whether there is sufficient evidence to prosecute; and b) whether that prosecution is in the public interest.

There were 15 criminal investigations ongoing throughout the period, of which 3 are awaiting trial in the courts following positive charging decisions issued by the Crown Prosecution Service / Crown Office and Procurator Fiscal Service.

A compound settlement is an agreement reached with HMRC in lieu of a referral to a prosecuting authority for the consideration of a criminal prosecution. A compound settlement offer may be made once a case has been assessed as suitable for referral to a prosecuting authority with each case thoroughly examined by specialist HMRC investigators. There is no obligation on an exporter to accept an offer and they are free to decline, but the case will subsequently be referred to prosecuting authorities.

HMRC continues to receive and review voluntary disclosures made by exporters. These disclosures are assessed by HMRC, and appropriate action taken. This ranges from educational visits to help exporters to get it right going forward, the issuing of written warnings, through to compound settlements and, in the most serious cases, referral to the UK prosecution authorities, for consideration for criminal prosecution. Table 9.4 shows the outcomes of voluntary disclosures made in 2023.

The Fraud Investigation Service increased the number of investigators working on export control and sanctions cases by 11 in the period and secured funding under the Economic Deterrence Initiative for further growth.

Table 9.4 Voluntary disclosures outcomes in 2023

Disposal	Total		
	2023	2022	2021
Voluntary Disclosures received	260	317	212
Warning Letters issued as a result of voluntary disclosures*	216	123	46
No Further Action (NFA) letters issued*	105	61	23
Compound settlement offers issued as a result of voluntary disclosures*	9 Offers, totalling £2,276,390.77	22 Offers, totalling £6,900,587.14	12 Offers, totalling £226,701.18

* Figures include letters and settlements issued in 2023 that relate to voluntary disclosures made in previous years.

HMRC works with DBT and other departments and agencies to contribute to raising awareness of strategic export controls and sanctions through educational outreach to business. HMRC also participates in outreach and capability-building events. This activity strengthens links with other enforcement agencies in the field of strategic export control and sanctions and improves the capabilities of our international partners. HMRC supports the international export control and sanctions commitments of HM Government through its contributions to international operational expert groups. These groups help improve international arms controls and aim to improve processes by sharing expertise and best practice.

This work includes supporting and contributing to the enforcement expert meetings of the MTCR, NSG, AG and WA (see Section 8). HMRC contributes to the Proliferation Security Initiative and the World Customs Organisation, working alongside international partners to strengthen capabilities to prevent the smuggling of illicit goods.

Table 9.5* Number of HMRC Strategic Exports and Sanctions Seizures

Year	Total
2023	266
2022	177
2021	202
2020	160
2019	194
2018	160

* Data is based on Management Information records as of 28 March 2024.

Table 9.6* Convictions

Year	Goods	Destination	Individual / company	Offence	Penalty
2023	-	-	-	-	-
2022	4kgs disodium sulphide hydrate	Pakistan	VWR International Ltd	Export of controlled chemicals contrary to Customs and Excise Management Act 1979 68(1)	£1000, reduced for early plea £660 + costs £2,650.50
2021	-	-	-	-	-
2020	-	-	-	-	-
2019	-	-	-	-	-
2018	Controlled Chemicals	Japan South Korea India Israel USA Canada Germany	Carbosynth Ltd	Export of controlled goods contrary to Customs and Excise Management Act 1979 section 68(1)	£4,269.96 plus costs
2018	Fighter jet parts	Iran (Malaysia and Dubai)	Alexander George Paul Attwater Iris Attwater	Export of military and dual-use goods contrary to Customs and Excise Management Act 1979 section 68(1)	2 and half years' imprisonment for Alexander George 6 months of imprisonment suspended for 12 months (Attwaters)
2018	Controlled chemicals including sodium Sulphide	Pakistan Jordan South Africa Saudi Arabia	VWR International Ltd	4 counts of exporting goods contrary to Customs and Excise Management Act 1979 section 68(1)	£7,039.00

* Data is based on Management Information records as of 28 March 2024.

Section 10:

Case Studies

This section contains a selection of case studies to illustrate some of the issues that we need to address when considering export licence applications.

The examples covering Chile and Mali highlight our approach to licensing assessments when circumstances in the country change. The Lebanon example focuses on our commitments to UN Security Council resolutions. The oil and gas example centres on compliance with relevant obligations and our commitments under multilateral export control regimes.

10.1 Chile

Throughout 2023, the UK and Chile celebrated 200 years of bilateral relations since the nomination of Britain's first Consul-General in Valparaiso in 1823. With cooperation on the Antarctic, climate change, international security, human rights and the signing of the Comprehensive and Progressive Agreement for Trans-Pacific Partnership, Chile is a key partner for the UK.

Export licence applications to Chile are assessed against the Criteria. This includes assessments against Criterion 2a (whether there is clear risk that the items might be used to commit or facilitate internal repression), and Criterion 7 (the existence of a risk that the items will be diverted to an undesirable end-user or for an undesirable end-use).

The Chilean social crisis of 2019-2020 saw widespread protests against the Government of Chile. Over 2,000 civilians and 1,000 police officers were believed to have been injured during violent confrontations that occurred during that period. The response by the Carabineros (Chile's national police force) drew international criticism from NGOs and the UN. Human rights violations, including excessive use of force and mistreatment of detainees, were widely reported. Injuries caused by the use of anti-riot shotguns by the Carabineros were highlighted as a concern.

In response to this, ECJU reassessed extant licences and live applications to identify whether they were compatible with Criterion 2a. ECJU considered a wide variety of information including from the British Embassy in Santiago, NGOs, and media reporting during the process. ECJU assessed that extant licences remained consistent with the Criteria but would continue to be kept under continual review.

Since the end of the protests in 2020, the Government of Chile has taken positive steps to address the abuses committed. It publicly accepted the recommendations of the UN, the Inter-American Commission on Human Rights (IACHR) and NGOs on police reform, establishing a joint unit with the IACHR to oversee the implementation of recommendations, the first time a state in Latin America has adopted such a joint model. These reforms to the Carabineros have led to improved transparency and oversight. Officers that committed abuses have been investigated⁴⁵ and charged.⁴⁷ There has also been evidence of improved policing methodologies in practice with Carabineros learning from the mistakes of 2019/2020.

While positive progress has been made, applications for crowd control equipment for use by front-line police and the military continue to be closely scrutinised against the Criteria, taking into account the facts and circumstances prevailing at the time. ECJU continues to track ongoing developments in Chile and consider the risks of internal repression and diversion.

10.2 Lebanon

Lebanon is an important partner, particularly for regional stability. As such the UK has worked to support the Lebanese Armed Forces (LAF) and the UN Interim Force in Lebanon (UNIFIL). The UK in recent years have supported the establishment and equipping of 4 LAF Land Border Regiments. Through its support programme to the LAF, the UK has provided 344 Land Rovers, 100 tactical armoured vehicles, trained over 34,000 LAF personnel, provided 3450 sets of personal protective equipment and supported the construction of 78 border towers. In September, the British armed forces took part in a joint military exercise, PEGASUS CEDAR, with the LAF.

The UN sanctions regime prohibits the sale or supply of arms and related materiel, and the provision of related services, without the authorisation of the Government of Lebanon or UNIFIL. This includes temporary exports of personal protective equipment brought into Lebanon by media and NGOs. The sanctions regime among other things is intended to halt the flow of arms and military technology to Hezbollah (also spelled Hizballah) and other armed groups. The current UNIFIL mandate include:

- the monitoring of the cessation of hostilities
- accompanying and supporting the LAF as they deploy throughout the south of Lebanon
- extending its assistance to help ensure humanitarian access to civilian populations
- the voluntary and safe return of displaced persons
- assisting the LAF in taking steps towards the establishment between the Blue Line and the Litani river, of an area free of any armed personnel, assets and weapons other than those of the Government of Lebanon and of UNIFIL deployed in this area
- assisting the Government of Lebanon, at its request, in securing its borders and other entry points to prevent the entry, in Lebanon without its consent, of arms or related materiel

To ensure the UK complies with UN sanctions, export licence applications for the export of military goods to Lebanon require paperwork that confirms Lebanese government or UNIFIL authorisation, typically in the form of an End-User Undertaking. Alternatively, ECJU seeks this confirmation

45 <https://www.indh.cl/indh-querellante-carabinero-de-coquimbo-queda-en-prision-preventiva-por-apremios-illegitimos-y-torturas-en-protestas/>

46 <https://www.amnesty.org/en/latest/news/2024/01/chile-indictment-senior-carabineros-official-justice/>

47 <https://www.hrw.org/world-report/2024/country-chapters/chile>

through our embassy in Beirut via a Note Verbale or asking the exporter to provide documentation from UNIFIL or the Government of Lebanon. This includes direct exports of military goods to these end users from the UK, or where a UK company is involved in the transfer or brokering of goods destined for these end users in Lebanon from another destination. This is often to support their personnel who are part of the UNIFIL mission. This process ensures the UK remains compliant with its international obligations and commitments under sanctions adopted by the UN Security Council, as required under Criterion 1 of the Criteria.

Under Criterion 7, the risk of diversion, each licence application is rigorously assessed to determine the risk that controlled items might be diverted to organisations such as Hizballah or other militant groups. An export licence would not be granted if it were inconsistent with any of the Criteria, this includes the risk of diversion.

Alongside the other criteria, applications are also assessed under Criterion 2a, the risk of internal repression. Exports that could be used to commit or facilitate internal repression are carefully scrutinised. The UK will not grant a licence if there is a clear risk that the item might be used to commit or facilitate internal repression.

10.3 Mali

In April 2013, UN Security Council resolution 2100 established the United Nations Multidimensional Integrated Stabilisation Mission in Mali (MINUSMA) to support a political process and carry out a number of security-related tasks.

Many export licensing decisions for Mali had Malian authorities or MINUSMA as end users. Applications were considered against the Strategic Export Licensing Criteria, in particular Criterion 1 (Respect for the UK's international obligations and relevant commitments), Criterion 2 (the risk of internal repression), Criterion 3 (internal peace and security), Criterion 7 (risk of diversion) and Criterion 8 (sustainable development).

Following two coups d'état in 2020 and 2021, a transitional military government then enlisted Russian proxy mercenaries (including the Wagner Group and Africa Corps) to conduct military operations against jihadist organisations predominantly, and more recently Tuareg armed groups. At the same time the authorities began to strengthen bilateral ties with Russia in the political and economic spheres. These trends have continued, and Wagner mercenaries are now present throughout the country. HM Government has monitored these developments and considered the risk of diversion to Russian proxies when assessing new export licence applications.

Since 2021, the human rights situation in Mali has deteriorated significantly. The partnership between the Malian Defence and Security Forces and Wagner Group has led to an increase in the intensity of military operations in Mali, which often target communities suspected of collaborating with jihadist groups, and beyond. These operations have been marked by widespread reports of human rights abuses and violations, including; executions, mass graves, arbitrary arrests, sexual violence and torture.

In June, at the request of the Malian authorities, the UN Security Council unanimously adopted resolution 2690 (2023), requesting the withdrawal of MINUSMA by 31 December 2023. The withdrawal of MINUSMA in December removed one of the last remaining mechanisms for international human rights oversight and accountability available in Mali. Throughout the six-month process of MINUSMA's rapid withdrawal, violence worsened particularly in the north of the

country, where Malian armed forces sought to occupy former MINUSMA bases and re-establish territorial control from armed groups. In doing so, they conducted regular air strikes alongside Wagner Group, some of which reportedly caused collateral harm to civilians.

Following the adoption of resolution 2690, ECJU responded quickly by reassessing extant licences for military and dual-use goods to Mali. These licences were reassessed against the Criteria with particular focus on Criterion 2a (the risk items might be used to commit or facilitate internal repression) and Criterion 7 (the risk items might be diverted to undesirable end users or for an undesirable end use). HM Government identified licences to Malian Government entities which, on completion of the reassessment were assessed to be no longer consistent with the Criteria. HM Government planned to revoke these licences. However, the relevant UK exporters surrendered the licences once notified of the intent to revoke. This meant that the licences were rendered unusable immediately. HM Government also took steps to remove Mali from certain military OGELs.

ECJU keep all remaining licences to Mali under careful and continual review and are prepared to suspend, refuse or revoke licences as circumstances require.

10.4 The oil and gas industry

Each year ECJU receives a large number of export licence applications for items intended for commercial end users in the oil and gas industry. The items may be used for a range of activities including detection, extraction, transportation and refining.

Each export licence application is assessed against each of the Criteria. The main focus of these assessments usually relates to Criterion 1, respect for the UK's international obligations and relevant commitments, in particular sanctions adopted by the UN Security Council, agreements on non-proliferation and other subjects, as well as other international obligations. For example, we assess:

- whether the destination is covered by a UN or UK arms embargo or sanction and whether the items or end users are in scope
- whether the end user might use the items to produce WMD
- whether granting a licence would be inconsistent with the UK's obligations under the Nuclear Non-Proliferation Treaty, the Biological and Toxin Weapons Convention, the CWC
- whether granting a licence would be inconsistent with the UK's commitments under multilateral export control regimes such as Australia Group (AG), Nuclear Suppliers' Group (NSG) or the Missile Technology Control Regime (MTCR)

Criterion 7, the existence of a risk that the items will be diverted to an undesirable end-user or for an undesirable end-use, also requires particular scrutiny.

When considering the Criteria, we look closely at the nature of the items as described in the goods description, for example:

- corrosion-resistant chemical manufacturing equipment, which is dual-use and in scope for AG guidelines, is common in the industry but can also be used for WMD production
- some equipment might have a dual-use for nuclear activity, for example, neutron generators which are controlled under NSG. However, these items can be used for checking petrochemical properties in an oil reservoir

- undersea equipment for seabed exploration such as inertial equipment or submersible equipment may be controlled under MTCR as the technology could be used for guiding missiles

HM Government then considers the destination in light of our relevant obligations and commitments, including checking the robustness of the recipient country's export controls and their general attitude to counter proliferation. We also take into account whether the destination country is a party to the major non-proliferation treaties or a member of the relevant regimes. However, just because the destination is a regime participant does not mean automatic approvals. For example, participating members of the AG commit to applying rigorous guidelines when considering the transfer of certain chemicals, biological agents, and dual-use chemical and biological manufacturing facilities and equipment, with the aim of ensuring that exports do not contribute to chemical and biological weapons activities and not to show preferential treatment to other participants.

The next consideration is the end user and intended end-use. We seek confirmation that the goods will be used by known or established companies at destinations for the detection, extraction, transport or refining of oil and gas.

Criterion 4, the risk that the items would, overall, undermine peace and security, is considered in more detail for some applications, such as where the end use might be in a disputed area. HM Government will take into account, inter alia, the likelihood that the items would be likely to cause, avert, increase or decrease peace and security in the region.

DBT ensures that companies operating in the sector are aware of HM Government policy on export controls. There is also a specific OGEL – Oil and Gas Exploration: Dual-Use Items – tailored to the requirements of the oil and gas industry for permitted destinations. The combination of items and destinations permitted in the OGEL have been assessed as consistent with the Criteria, but an OGEL can be amended, suspended or revoked if the assessment changes. The conduct of OGEL users is monitored through compliance inspections.

Annex A:

The Strategic Export Licensing Criteria

Taken from the Statement to Parliament on 8 December 2021⁴⁸

The Strategic Export Licensing Criteria

This statement of the Criteria is guidance given under section 9 of the Export Control Act 2002. It replaces the Consolidated EU and National Arms Export Licensing Criteria announced to Parliament on 25 March 2014.

Criterion One

Respect for the UK's international obligations and relevant commitments, in particular sanctions adopted by the UN Security Council, agreements on non-proliferation and other subjects, as well as other international obligations.

The Government will not grant a licence if to do so would be inconsistent with, inter alia:

- a) the UK's obligations and its commitments to enforce United Nations and Organisation for Security and Co-operation in Europe (OSCE) sanctions, as well as national sanctions observed by the UK and other relevant commitments regarding the application of strategic export controls;
- b) the UK's obligations under the United Nations Arms Trade Treaty;
- c) the UK's obligations under the Nuclear Non-Proliferation Treaty, the Biological and Toxin Weapons Convention and the Chemical Weapons Convention;
- d) the UK's obligations under the United Nations Convention on Certain Conventional Weapons, the Convention on Cluster Munitions (the Oslo convention), the Cluster Munitions (Prohibitions) Act 2010, and the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction (the Ottawa convention) and the Land Mines Act 1998;
- e) the UK's commitments in the framework of the Australia Group, the Missile Technology Control Regime, the Zangger Committee, the Nuclear Suppliers Group, and the Wassenaar Arrangement;

48 <https://questions-statements.parliament.uk/written-statements/detail/2021-12-08/hcws449>

f) the OSCE principles governing conventional arms transfers.

Criterion Two

Respect for human rights and fundamental freedoms in the country of final destination as well as respect by that country for international humanitarian law.

Having assessed the recipient country's attitude towards relevant principles established by international human rights instruments, the Government will:

a) Not grant a licence if it determines there is a clear risk that the items might be used to commit or facilitate internal repression;

Internal repression includes, inter alia, torture and other cruel, inhuman and degrading treatment or punishment; summary or arbitrary executions; disappearances; arbitrary detentions; and other serious violations of human rights and fundamental freedoms as set out in relevant international human rights instruments, including the Universal Declaration on Human Rights and the International Covenant on Civil and Political Rights.

For these purposes items which might be used for internal repression will include, inter alia, items where there is evidence of the use of these or similar items for internal repression by the proposed end-user, or where there is reason to believe that the items will be diverted from their stated end-use or end-user and used for internal repression. The nature of the items to be transferred will be considered carefully, particularly if they are intended for internal security purposes.

b) Exercise special caution and vigilance in granting licences, on a case-by-case basis and taking account of the nature of the equipment, to countries where serious violations of human rights have been established by the competent bodies of the UN or the Council of Europe;

Having assessed the recipient country's attitude towards relevant principles established by instruments of international humanitarian law, the Government will:

c) Not grant a licence if it determines there is a clear risk that the items might be used to commit or facilitate a serious violation of international humanitarian law.

In considering the risk that items might be used to commit or facilitate internal repression, or to commit or facilitate a serious violation of international humanitarian law, the Government will also take account of the risk that the items might be used to commit or facilitate gender-based violence or serious acts of violence against women or children.

Criterion Three

Preservation of internal peace and security

The Government will not grant a licence if, having assessed the potential that the items would either contribute to or undermine internal peace and security, it determines there is a clear risk that the items would, overall, undermine internal peace and security.

When assessing the potential that the items would contribute to or undermine internal peace and security, the Government will take into account, inter alia and where relevant:

a) Whether the grant of the licence would provoke or prolong armed conflicts;

- b) Whether the items are likely to be used other than for the legitimate national security or defence of the recipient;
- c) Whether the items would be likely to cause, avert, increase or decrease conflict or instability in the country of final destination, taking into account (inter alia):
 - i) the balance of forces between states or actors concerned;
 - ii) the potential for the equipment to have a significant impact on the effectiveness of existing capabilities or force projection;
 - iii) humanitarian purposes or impacts;
 - iv) the nature of the conflict, including the conduct of all states or actors involved, and any involvement by the UK and allied states;
 - v) border stability and legitimate national security interests of the recipient.
- d) Whether the items might be used to commit or facilitate gender-based violence or serious acts of violence against women or children.

Criterion Four

Preservation of peace and security

The Government will not grant a licence if, having assessed the potential that the items would either contribute to or undermine peace and security, it determines there is a clear risk that the items would, overall, undermine peace and security.

When assessing the potential that the items would contribute to or undermine peace and security, the Government will take into account, inter alia and where relevant:

- a) The existence or likelihood of armed conflict in which the recipient would take part;
- b) Whether the recipient has in the past tried or threatened to pursue, by means of force, a claim against the territory of another country;
- c) The likelihood that the items would be used in the territory of another country other than for legitimate purposes, including national or collective self-defence;
- d) Whether the items would be likely to cause, avert, increase or decrease conflict or instability in the region, taking into account (inter alia):
 - i) the balance of forces between the states or actors in the region concerned;
 - ii) their approach to expenditure on defence;
 - iii) the potential for the equipment to have a significant impact on the effectiveness of existing capabilities or force projection;
 - iv) humanitarian purposes or impacts;
 - v) the nature of the conflict, including the conduct of all states or actors involved, and any involvement by the UK and allied states;
 - vi) border stability and legitimate national security interests of the recipient.

- e) Whether the items might be used to commit or facilitate gender-based violence or serious acts of violence against women or children.

Criterion Five

The national security of the UK and territories whose external relations are the UK's responsibility, as well as that of friendly and allied countries.

The Government will take into account:

- a) the risk of the items undermining or damaging the UK's national security or those of other territories and countries as described above;
- b) the risk of the items being used against UK forces or against those of other territories and countries as described above;
- c) the need to protect classified information and capabilities.

Criterion Six

The behaviour of the buyer country with regard to the international community, as regards in particular its attitude to terrorism and transnational organised crime, the nature of its alliances and respect for international law.

- a) Having assessed the potential that the items could be used to commit or facilitate an act constituting an offence under international conventions or protocols to which the UK is a Party relating to terrorism or transnational organised crime, the Government will not grant a licence if it determines there is a clear risk that the items could be used to commit or facilitate such an act.

In making this assessment, the Government will also take account of the risk that the items might be used to commit or facilitate gender-based violence or serious acts of violence against women or children.

- b) The Government will also take into account, inter alia, the record of the buyer country with regard to:
 - i) its compliance with relevant international obligations, in particular on the non-use of force, including under international humanitarian law applicable to international and non-international conflicts;
 - ii) its commitment to non-proliferation and other areas of arms control and disarmament, in particular the signature, ratification and implementation of relevant arms control and disarmament instruments referred to in Criterion One.

Criterion Seven

The existence of a risk that the items will be diverted to an undesirable end-user or for an undesirable end-use

In assessing the risk that the items might be diverted to an undesirable end-user or for an undesirable end-use, the Government will take into account:

- a) the legitimate defence and domestic security interests of the recipient country, including any involvement in United Nations or other humanitarian or peace-keeping activity;
- b) the technical capability of the recipient country to use the items;
- c) the capability of the recipient country to exert effective export controls;
- d) the risk of re-export to undesirable destinations;
- e) the risk of diversion to terrorist organisations, individual terrorists or to transnational organised crime;
- f) the risk of reverse engineering or unintended technology transfer;
- g) the risk of an undesirable end-use either by the stated end-user or another party.

Criterion Eight

The compatibility of the transfer with the technical and economic capacity of the recipient country, taking into account the desirability that states should achieve their legitimate needs of security and defence with the least diversion for armaments of human and economic resources.

The Government will take into account, in the light of information from relevant sources such as United Nations Development Programme, World Bank, IMF and Organisation for Economic Cooperation and Development reports, whether the proposed transfer would seriously undermine the economy or seriously hamper the sustainable development of the recipient country.

The Government will consider in this context, among other factors, the recipient country's relative levels of military and social expenditure, taking into account also any bilateral or multilateral aid, and its public finances, balance of payments, external debt, economic and social development and any IMF or World Bank-sponsored economic reform programme.

Other Factors

In exceptional circumstances the government may decide not to grant a licence for reasons other than those set out in Criteria 1 to 8 where the items may have a significant negative impact on the UK's international relations.

Annex B:

Licence type definitions

Standard Individual Export Licences (SIELs)

SIELs allow shipments of specified items to a specified consignee or end user up to a quantity specified in the licence. If the export will be permanent, SIELs are generally valid for 2 years or until the quantity specified has been exported, whichever occurs first.

If an export is temporary, for example for the purposes of demonstration, trial or evaluation, a SIEL is generally valid for one year only and the items must be returned to the UK before the licence expires. Checks are in place to ensure that items have returned to the UK.

Open Individual Export Licences (OIELs)

OIELs cover multiple shipments of specified items to specified destinations and/or, in some cases, specified consignees. An OIEL is a tailored and flexible licence and generally valid for 5 years. The exceptions are OIELs for the transfer of military items from Northern Ireland to destinations in EU Member States, which are valid for 3 years, but may be renewed at the exporter's request; and "dealer-to-dealer" OIELs, which allow firearms dealers to export certain categories of firearms and ammunition solely to firearms dealers in the EU, and which are also valid for 3 years.

Applications must include items to be exported and destinations, but specific quantities and named end users do not necessarily need to be provided before a licence is issued. This data must be provided over the lifetime of the licence. The rejection of an application for an OIEL; or an amendment to exclude destinations and/or items; or the revocation of an OIEL, does not prevent a company from applying for SIELs covering some, or all of the items to specified consignees in the relevant destinations. The factors that led to the original decision on the OIEL would be considered in the decision about a SIEL application.

Open General Export Licences (OGELs)

OGELs are pre-published licences that permit the export of specified items to specified destinations, following an online registration. They remove the need for exporters to apply for individual licences if the exporters can meet the terms and conditions set out in the licence. Failure to meet the terms and conditions may result in the licence being withdrawn. An OGEL or other type of Open General licence is only published when the exports are consistent with the Criteria. If the assessment

changes, for the items and destinations permitted, then the OGEL is amended or revoked. OGELs generally remain in force until they are revoked. All OGELs are published on GOV.UK. OGELs in force in 2023 are listed in Annex D.

Retained General Export Authorisations (GEAs)

There are 6 retained GEAs under the retained Dual-Use Regulations. These permit the export from Great Britain of certain specified dual-use items to specified destinations, subject to the terms and conditions of the licences. They are equivalent to OGELs and are available for use by any exporter in Great Britain. The GEAs are contained in Annexes II(a) to II(f) of the retained Dual-Use Regulation. There is also one retained GEA under the retained Torture Regulation. This covers the goods listed in any entry in Annex IV of the retained Torture Regulation to certain destinations that have abolished capital punishment. All the GEAs are listed in Annex D.

Union General Export Authorisations (GEAs)

There are 8 Union GEAs under the recast Dual-Use Regulation 2021/821 that is applicable in Northern Ireland. These permit the export from Northern Ireland of certain specified dual-use items to specified destinations, subject to the terms and conditions of the licences. They are equivalent to OGELs and are available for use by any exporter in Northern Ireland. The Union GEAs are contained in Sections A-H of Annex II of the retained Dual-Use Regulation. There is also one Union GEA under the Torture Regulation applicable in Northern Ireland. This covers the goods listed in any entry in Annex IV of the Torture Regulation to certain destinations that have abolished capital punishment. All the Union GEAs are listed in Annex D.

Standard Individual Trade Control Licences (SITCLs)

A SITCL is specific to a named UK trader or broker and covers involvement in the trade of a specified quantity of specific goods between a specified overseas country, known as the source country, and between a specified consignor, consignee and end user in an overseas destination country. SITCLs will normally be valid for 2 years. When a licence expires, either due to the length of time since it was issued or because the activity has taken place, the licence ceases to be valid. If further similar activity needs to take place, another licence must be applied for. Trade controls only apply to Category A, B and C goods as specified in Article 2 and Schedule 1 of the Export Control Order 2008. They do not apply to software and technology.

Open Individual Trade Control Licences (OITCLs)

An OITCL is specific to a named UK trader and covers involvement in the trade of specific goods between specified overseas source and destination countries and/or specified consignor(s), consignee(s) and end user(s). OITCLs are generally valid for 5 years. The refusal of an application for an OITCL; an amendment to exclude destinations and/or items; or the revocation of an OITCL, does not prevent a broker from applying for SITCLs covering some or all of the items to specified consignees in the relevant destinations. The factors that led to the original decision on the OITCL would be considered in the decision about a SITCL application.

Open General Trade Control Licences (OGTCLs)

An OGTCL is a pre-published licence that permits the supply of specified goods from specified source countries outside the UK to specified destinations, subject to the specific terms and conditions of the licence. There are currently 4 OGTCLs available.

Standard Individual Transshipment Licences (SITLs)

A SITL is specific to a named transit/transshipment provider and covers a set quantity of specific goods between a specific source and destination country with a specified consignor, consignee and end user. SITLs are normally valid for 2 years.

Open General Transshipment Licences (OGTLs)

OGTLs are like OGELs. They relate to transit rather than export and are subject to specific terms and conditions. There are currently 4 different types of OGTL. Holders of Open Individual and Open General licences are subject to audit by ECJU Compliance Officers, to ensure that they are using the correct licence and meeting the terms and conditions of their licences.

Information on Financial Services, Brokering Services, Technical Assistance, Syria Humanitarian and Global Project Licences, is provided in Annex D.

General Trade Licences (GTLs)

GTLs are pre-published open general licences that cover export and trade measures. They are typically used for licensing activities prohibited under sanctions legislation.

Technical Assistance Licences

Standard Individual Technical Assistance Licences (SITALs) are issued for separate ad hoc requirements, for example the repair of a single item or simple maintenance tasks.

Open Individual Technical Assistance Licences (OITALs) cover wide-ranging contractual issues which may form the basis of a rolling programme of work.

Under Article 19 of the Export Control Order 2008, as amended, licences are required for the provision of technical assistance for any activity where a person is aware or has been informed that the items are or may be intended for the purposes of WMD. This could include the transfer of documents or personnel.

Where an application is for goods and services and a refusal has been recommended under the WMD end-use control⁴⁹ we may combine the SIEL application with the SITAL application and refuse them together.

OITALs are issued for the provision of technical assistance relating to military or dual-use items and activities where this is permitted under exemptions to international sanctions and embargoes.

Financial Services and Brokering Services Licences

UK sanctions regimes contain certain prohibitions and restrictions on the provision of, brokering services, financial services and funds where they relate to certain specified goods or technology. The specific prohibitions and restrictions are outlined in the relevant UK sanctions regime.⁵⁰ In cases where the provision of such services is subject to prior authorisation, a Brokering Services Licence and/or a Financial Services Licence may be granted.

⁴⁹ <https://www.gov.uk/guidance/supplementary-wmd-end-use-controls>

⁵⁰ <https://www.gov.uk/guidance/uk-sanctions>

DBT is the UK competent authority for the licensing of the provision of brokering services and financial services and funds related to prohibited or restricted trade transactions. The Office of Financial Sanctions Implementation in HM Treasury is the UK competent authority for implementing financial sanctions, including asset freezes.

The Russia (Sanctions) (EU Exit) Regulations 2019, prohibit the provision of brokering services, financial services and funds relating to certain specified goods or technology. Licences may be granted for the provision of such services in certain circumstances.

Syria Humanitarian Licences

DBT is the competent authority for the issuing of humanitarian licences in respect of prohibited or restricted trade transactions.

The Syria (Sanctions) (EU Exit) Regulations 2019, prohibit the purchase, supply or delivery of crude oil; or petroleum products originated or located in or consigned from Syria; or directly, or indirectly provide financial services or funds for these prohibited activities. However, these activities may be authorised under a licence, if the purchase or supply or delivery of crude oil or petroleum products; or the provision of related financial services or funds, are for the sole purpose of providing humanitarian assistance activities in Syria; or assistance to the civilian population in Syria.

Financial Services, Brokering Services and Technical Assistance Licences under UK sanctions regimes

Licences covering more than one prohibited service (Financial Services, Brokering Services and Technical Assistance) relating to restricted goods and restricted technology was issued under The Russia (Sanctions) (EU Exit) Regulations 2019.

Professional and Business Services Licences

Throughout 2023, DBT was the competent authority for licensing the provision of professional and business services that are subject to trade sanctions. In 2024, this role will transition to the newly established Office for Trade Sanctions Implementation.

As a result of further sanctions imposed on Russia in 2022, a licence is required if a person wishes to provide prohibited professional and business services. Sanctions related to accounting, business and management consulting, and public relations services came into force on 21 July 2022. Further sanctions related to advertising, architectural, auditing, engineering and IT consultancy and design services, came into force on 16 December 2022. The latest sanctions related to legal advisory services came into force on 30 June 2023.

Licence for energy-related goods

The Russia (Sanctions) (EU Exit) Regulations 2019 prohibits a person directly or indirectly making energy-related goods available for use in Russia.

Licences for drugs used in execution by lethal injection

The Torture Regulation and the Regulation (EU) 2019/125 that applies in Northern Ireland, require licences from ECJU to export short and intermediate-acting barbiturate anaesthetic agents to any destination from Great Britain, or outside the EU from Northern Ireland. These drugs which have legitimate medical uses include the following:

- Amobarbital (CAS RN 57-43-2)
- Amobarbital sodium salt (CAS RN 64-43-7)
- Pentobarbital (CAS RN 76-74-4)
- Pentobarbital sodium salt (CAS 57-33-0)
- Secobarbital (CAS RN 76-73-3)
- Secobarbital sodium salt (CAS RN 309-43-3)
- Thiopental (CAS RN 76-75-5)
- Thiopental sodium salt (CAS RN 71-73-8), also known as “thiopentone sodium”

Licence applications or registration must be submitted for any intended export of these drugs. A licence cannot be issued when there are reasonable grounds to believe that these drugs might be used for capital punishment in a third country.

In recent years OIEL applications have largely been replaced by registration for the EU GEAs under the Torture Regulation. This licence covers multiple exports of these drugs to end users in numerous destinations.

The UK controls Pancuronium Bromide and Propofol under the listing of human and veterinary medicinal products that are prohibited for export to the US, when they are in a form suitable for injection or for preparation of an injection.

Global Project Licences (GPLs)

GPLs are a form of OIEL introduced by Framework Agreement Partners (France, Germany, Italy, Spain, Sweden, and the UK) to streamline the arrangements for licensing military goods and technologies between partner states who are participating in specific collaborative defence projects. In relation to the collaborative project, each partner state will, as appropriate, issue its own GPLs to permit transfers of specified goods and technology required for that project.

Applications for GPLs are assessed against the Strategic Export Licensing Criteria in the UK, and against the EU Common Position⁵¹ in other Framework Partner countries.

⁵¹ Council Common Position 2008/944/CFSP of 9th December 2008 defining common rules governing control of exports of military technology and equipment.

Annex C:

A summary of key changes affecting OGELs in 2023

February – A General Trade Licence was introduced to facilitate humanitarian assistance in relation to earthquake efforts in Syria and Turkey (Syria Sanctions- Earthquake Relief Efforts in Syria):

- supply/delivery of petroleum products
- provision of related financial services or funds
- due to expire on 31 August 2023

March – Updates to 6 OGELs to reflect changes to the Military List (see NTE 2022/26):

- Military goods and technology: India
- Technology for Military goods
- Military goods A400M Collaborative programme

July – Revised General Trade Licence (Syria Sanctions- Earthquake Relief Efforts in Syria):

- it was due to expire on 31 August 2023, but it will now remain in force until it is revoked

July – Updates to 6 OGELs to address updates to the lists of controlled items in the dual-use regulations:

- Export for repair/replacement under warranty: dual-use items
- Export after repair/replacement under warranty: dual-use items
- Export after exhibition: dual-use items
- Low value shipments
- Technology for dual-use items
- Dual-use items India

August – The following General Licence was published to permit the direct or indirect provision of legal advisory services:

- Russia Sanctions- certain legal advisory services

November – Update to OGEL relating to the Turkish Aerospace Industries TF-X programme:

- Includes 2 alternative names for the TF-X programme

Annex D:

OGELs and other general licences in force in 2023

Dual-use OGELs: these permit the export of certain controlled dual-use goods:

- Chemicals
- Cryptographic Development
- Dual-Use Items – India
- Export After Exhibition: Dual-use Items
- Export After Repair/Replacement Under Warranty: Dual-use Items
- Export for Repair/Replacement Under Warranty: Dual-use Items
- Export of Dual-Use Items to EU Member States
- Exports of non-lethal Military and Dual-use Goods: to UK Diplomatic Missions or Consular posts
- Information Security Items
- Low Value Shipments
- Military and Dual-Use Goods: UK Forces deployed in embargoed destinations
- Military and Dual-Use Goods: UK Forces deployed in non-embargoed destinations
- Oil and Gas Exploration: Dual-Use Items
- Technology for Dual-Use Items
- PCBs and Components for dual-use items
- X

Military Goods OGELs: these permit the export of certain controlled military goods:

- Access Overseas to Software and Technology for Military Goods: Individual Use Only
- Certified Companies
- Export After Exhibition or Demonstration: Military Goods
- Export After Repair/replacement under warranty: Military goods
- Export for Exhibition: Military Goods
- Exports for Repair/replacement under warranty: Military goods

- Exports in Support of Joint Strike Fighter: F-35 Lightning II
- Exports in support of Turkish Aerospace Industries TF-X programme
- Exports or transfers in Support of UK Government Defence Contracts
- Exports under the US-UK Defence Trade Cooperation Treaty
- Historic Military Goods
- Historic Military Vehicles and Artillery Pieces
- Military Components
- Military Goods, Software and Technology
- Military Goods: Collaborative Project Typhoon
- Military Goods: For Demonstration
- Military Goods: A400M Collaborative Programme
- Military Goods, Software and Technology: Government or NATO End Use
- Military Goods and Technology – India
- Military Surplus Vehicles
- PCBs and Components for Military Goods
- Software and Source Code for Military Goods
- Technology for Military Goods
- Vintage Aircraft

Other types of General Licences:

- Iraq
- Radioactive sources
- General Trade Licence (Russia: Sanctions)
- General Trade Licence (Russia Sanctions – Financial Services and Funds related to Fertilisers)
- General Trade Licence (Russia Sanctions – Vessels)
- General Trade Licence Syria Sanctions – (Earthquake Relief Efforts in Syria)
- General Trade Licence (Russia Sanctions – Legal Advisory Services)

Open General Transshipment Licences (OGTLs): these allow, subject to certain conditions, controlled goods to be exported from one country to another via the UK:

- Sporting Guns
- Postal Packets
- Transshipment Licence

Open General Trade Control Licences (OGTCLs): these control trafficking and brokering activity between one third country and another where the transaction or deal is brokered in the UK or by a UK person:

- Category C Goods
- Insurance or Re-Insurance

- Maritime Anti-Piracy
- Trade and Transportation: Small Arms and Light Weapons

The Retained General Export Authorisations are as follows:

- GEA001 – Exports of most dual-use items to Australia, Canada, Japan, New Zealand, Norway, Switzerland, Liechtenstein, and the United States
- GEA002 – Exports of certain dual-use items to certain destinations
- GEA003 – Exports after repair/replacement
- GEA004 – Temporary export for exhibition or fair
- GEA005 – Telecommunications
- GEA006 – Chemicals
- GEA 2019/125

The Union General Export Authorisations are as follows:

- EU001 – Exports of most dual-use items to Australia, Canada, Japan, New Zealand, Norway, Switzerland, Liechtenstein, and the United States
- EU002 – Exports of certain dual-use items to certain destinations
- EU003 – Exports after repair/replacement
- EU004 – Temporary export for exhibition or fair
- EU005 – Telecommunications
- EU006 – Chemicals
- EU007 – Intra-group export of software and technology
- EU008 – Encryption
- EU GEA 2019/125

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