

# **United Kingdom Strategic Export Controls Annual Report 2024**

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# Foreword

This is His Majesty's Government's 28<sup>th</sup> 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 2024, with decisions to 4 July under the previous Government.

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 2024, HM Government continued to assess export licence applications 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 the UK faces, keep pace with new technologies, and adapt to changing circumstances. During 2024, the Export Control Joint Unit (ECJU) processed 15,464 Standard Individual Export Licence (SIEL) applications, completing 60% within 20 working days, an improvement from 52% in 2023, although still below the 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 being explored to remedy this. While there is still some way to go in meeting its public targets, ECJU has put in place new measures to improve performance. Section 2 of this report provides more detail of export licensing and performance statistics.

During 2024 progress continued in delivering the modern digital system for export licensing – LITE (Licensing for International Trade and Enterprise). In September 2024 the 'Apply for a Standard Individual Export Licence' service entered 'public beta', meaning all exporters can now apply for a SIEL using the new system (more details in Section 3.2 of this report).

Throughout 2024, there remained strong Parliamentary, public and media interest in strategic export control issues, particularly on Israel. Further information about export licensing for Israel can be found in Section 7.2.

In 2024, HM Government continued to expedite export licence applications to Ukraine. This is one of many ways the UK continues to be at the forefront in supporting Ukraine in responding 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. Further information can be found in Section 7.1.

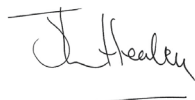
HM Government continues to operate one of the most robust licensing regimes in the world, and this annual report demonstrates our continued commitment to transparency and accountability.



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:

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## 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 range of international legal commitments, including the Arms Trade Treaty (ATT) and those resulting from United Nations (UN) arms embargoes or trade sanctions are implemented.

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.

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

Under the terms of the Windsor Framework<sup>2</sup>, 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 2024.

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 assimilated 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:
  - The Nuclear Suppliers Group<sup>3</sup>

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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>

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

- The Missile Technology Control Regime<sup>4</sup>
- The Australia Group<sup>5</sup>
- The Wassenaar Arrangement<sup>6</sup>
- The Zangger Committee<sup>7</sup>
- the list of goods covered by assimilated 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 assimilated 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 assimilated 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”.

### The licensing process and relevant Departments

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

## 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).

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/>



## 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 the Licensing Unit, Technical Assessment Unit, Stakeholder Engagement Team, Compliance Inspectorate Team, Licensing Intelligence Team, Data Team, Continuous Improvement 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 2024, DBT had a total number of 126 posts within ECJU (including temporary posts within the LITE temporary project team), with 113 people in post and 13 vacant posts (10% vacancy rate). By the end of 2024, DBT's total number of posts within ECJU (including LITE) increased to 129, with 120 people in post and 9 vacant posts (7% vacancy rate).

DBT also leads on trade sanctions, which can include prohibitions on the import, export, transfer, movement, making available or acquisition of goods and technology; the provision or procurement of services related to goods and technology; or the provision or procurement of certain other non-financial services.

ECJU is responsible for licensing the export of goods, software and technology from the UK, including issuing licences for the export of goods and the provision of ancillary services to sanctioned destinations. DBT's Office of Trade Sanctions Implementation (OTSI) was launched in October 2024 to strengthen the UK's implementation and enforcement of trade sanctions. OTSI is responsible for issuing licences for the provision of sanctioned standalone services, including professional and business services; and detecting and responding to suspected trade sanctions breaches. OTSI is also responsible for civil enforcement of certain trade sanctions including services and the movement of goods involving UK companies and persons which do not cross the UK border.

## 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 terrorism or transnational organised crime
- could 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 relevant Form 680s (F680s), a security procedure assessing the release of UK classified material. FCDO assesses whether the release of information would be consistent with the UK's international obligations and commitments and sanctions regimes.

In making its assessment, the FCDO takes account of the proposed end-use of the items, the situation in the destination, and the end-user. The FCDO ECJU team seeks detailed political, sanctions, human rights advice as necessary from the FCDO's policy desks, posts overseas and other sources, including Non-Governmental Organisations (NGOs), or media reporting.

On 1 January 2024, the FCDO had 19 roles within ECJU, including 1 vacant post. By the end of 2024, the FCDO had 18 posts within ECJU, with 18 posts filled and no vacancies. These figures represent the FCDO roles within ECJU and exclude the range of other teams across FCDO which contribute to export licence assessments.

### **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 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 Section 6).

On 1 January 2024, MOD had 10 posts within ECJU, with 8 posts filled and 2 vacant posts (20% vacancy rate). By the end of 2024, MOD had 10 posts within ECJU, with 7 posts filled and 3 vacant posts (30% vacancy rate). These figures just represent the MOD posts within ECJU and exclude the range of other teams across MOD which contribute to export licence assessments.

### **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.

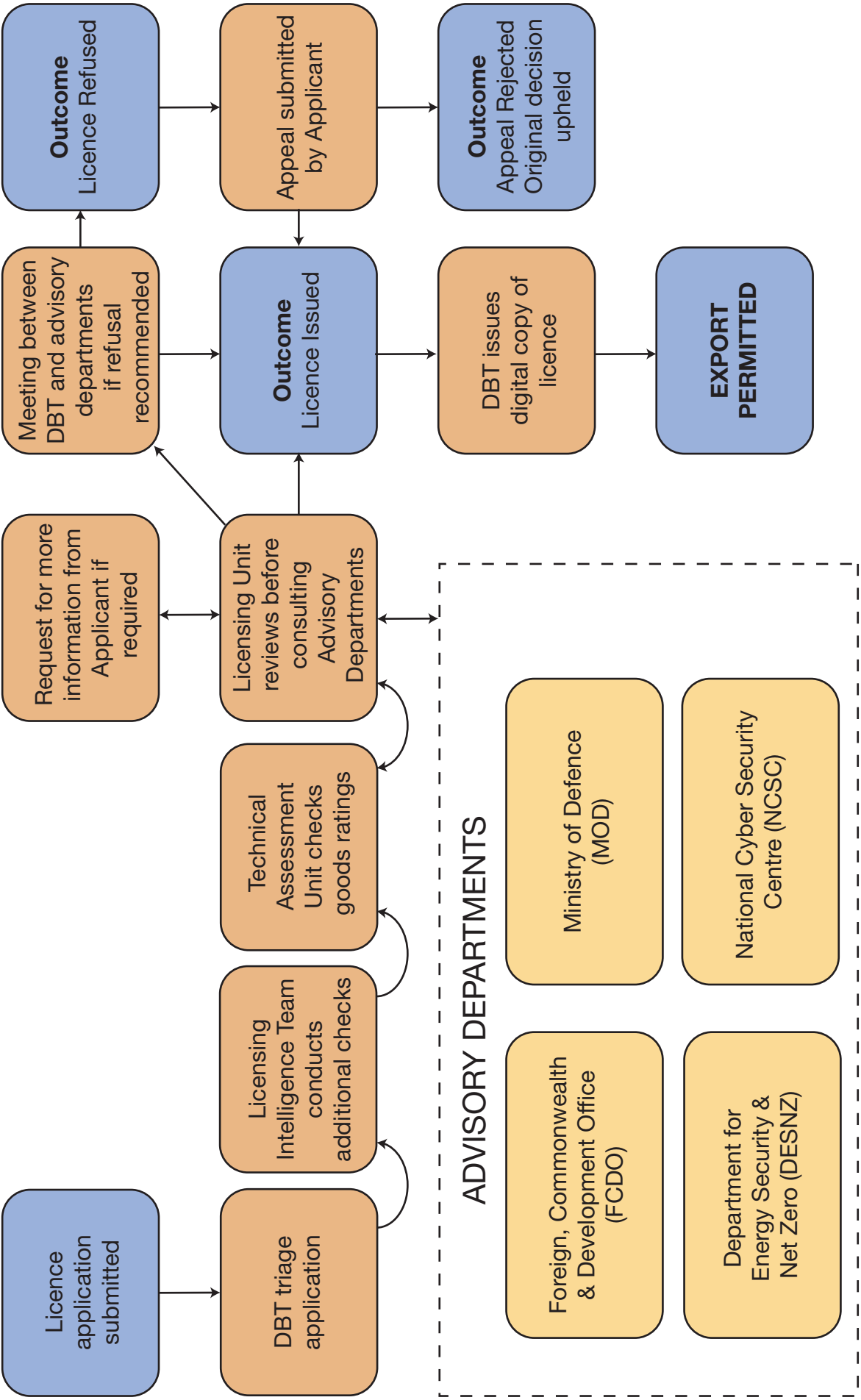
## **HM Revenue and Customs (HMRC)**

HMRC does not provide direct advice on export licence applications but has a key role to play in the licensing system. It is responsible for enforcing UK export controls and trade sanctions which fall within its customs remit, and for certain trade sanctions outside its customs remit that it will enforce under criminal law on referral from the Office of Trade Sanctions Implementation (OTSI) which became operational in October 2024.

HMRC works with 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

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 LITE, which is being gradually introduced. 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 2024
Standard Individual Export Licences (SIELs)	15,253 <sup>8</sup>
Open Individual Export Licences (OIELs)	375
Open General Export Licences (OGELs)*	1,099
Assimilated General Export Authorisations (GEAs)*	225
Union General Export Authorisations (GEAs)*	35
Standard Individual Trade Control Licences (SITCLs)	206
Open Individual Trade Control Licences (OITCLs)	34
Open General Trade Control Licences (OGTCLs)*	51
Standard Individual Transshipment Licences (SITLs)	12
Open General Transshipment Licences (OGTLs)*	2
General Trade Licences*	77
Other types of General licences*	1

\* Registrations

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

<sup>8</sup> 9,193 SIEL applications were made on the SPIRE system and 6,060 were made on the new online export licensing system, LITE.

## Section 2:

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# Export licensing data

### 2.1 Transparency

HM Government publishes quarterly strategic export controls licensing decisions statistics<sup>9</sup> providing data about decisions made on licence applications, including those issued, refused, rejected, or revoked. In addition, an online searchable database (Strategic Export Controls: Reports and Statistics website)<sup>10</sup> is provided to allow users to produce bespoke reports drawing on this data. HM Government remains committed to openness and transparency of strategic export licensing to enable Parliament and the public to hold it to account.

Part of the development of ECJU's new digital system, LITE, is to provide data relating to LITE licensing decisions. During 2024, while the required data 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, which enables users to create reports based on their own search criteria. LITE licensing data was also excluded from some of the more detailed data tables provided within our strategic export controls licensing decisions statistics throughout 2024, published on GOV.UK. These limitations were appropriately caveated alongside the impacted figures in both the published licensing decisions statistics<sup>11</sup> and this annual report. For context, 31% (3,504) of SIEL licensing decisions were made in LITE during 2024, compared with 69% (7,910) in SPIRE.

In December 2024, as part of the 2024 quarter 1 (covering 1 January – 31 March 2024) and quarter 2 (covering 1 April – 30 June 2024 ) publication, the ECJU Official Statistics were temporarily reclassified to Official Statistics in Development.<sup>12</sup> The application of the Official Statistics in Development label is an established procedure set out by the Office for Statistics Regulation, used when Official Statistics are undergoing major changes likely to affect their quality for a certain period of time. This change was made when entering a critical stage in LITE's development, with the statistical publication needing to exclude the majority of data relating to LITE cases. However, whilst the 2024 quarter 4 (covering 1 October – 31 December 2024)

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

<sup>10</sup> <https://www.exportcontrol.db.trade.gov.uk/sdb2/fox/sdb/>

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

<sup>12</sup> <https://osr.statisticsauthority.gov.uk/policies/official-statistics-policies/official-statistics-in-development/>

publication (published in May 2025) retained the ‘Official Statistics in Development’ classification, there were significant improvements in relation to the LITE data published, with the publication including the majority of data relating to LITE cases. This also included retrospectively publishing LITE data for the full 2024 calendar year and now provides a comprehensive overview of the export control licensing system for 2024.

As further LITE functionality is rolled out, it will be possible to gradually increase and improve the data published from LITE. As part of this iterative process, all LITE data omitted during the transition period will be retrospectively published to ensure there is no overall reduction in transparency. The development of LITE is also being used as an opportunity to improve how data is published 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.

Given the exceptional circumstances, and the significant Parliamentary and public interest in the conflict in Gaza, DBT published a series of ad hoc management information releases<sup>13</sup> during 2024 to provide more current information about Israel export licensing – on 11 June 2024 and 10 December 2024. These ad hoc management information releases provided data on Israel export licence applications in progress at the date of each update; Israel export licences that remained extant at the date of each update; and Israel export licensing decisions made between 7 October 2023 and the date of each update. These ad hoc releases included both SPIRE and LITE data and are therefore representative of all licensing activity for Israel in the periods to which they relate.

## 2.2 Data for each licence type

The following tables and charts provide details of the outcomes during 2024 on each of the main types of licence during 2024. Those processed to completion in 2024 will also include applications originally received in 2023, and a few before that. Any data referred to as “Issued”, “Refused”, “Rejected” or “Revoked” is taken from the quarterly statistics available on GOV.UK.

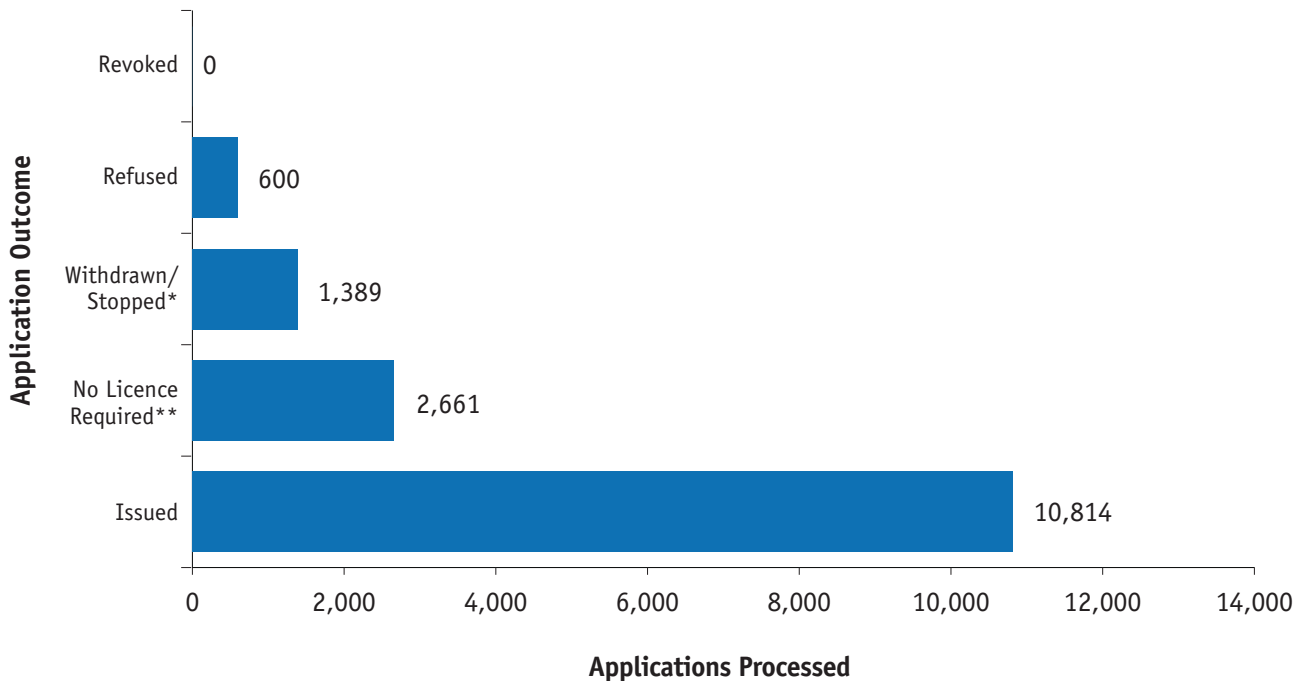
Comprehensive data on export licensing decisions is published regularly throughout the year on GOV.UK. All other data in this section is taken from the SPIRE and LITE licensing databases as of 5 June 2025, unless an alternative date is stated.

**Table 2.1 Summary of application outcomes**

Outcome	SIELs	SITLs	OIELs	SITCLs	OITCLs
Issued	10,814	1	316	116	15
Refused / Rejected	600	0	62	11	12
No Licence Required	2,661	1	0	19	1
Withdrawn, Stopped or Unsuitable	1,389	10	93	68	18
Revoked	0	0	0	0	0

<sup>13</sup> <https://www.gov.uk/government/publications/export-control-licensing-management-information-for-israel>

**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:

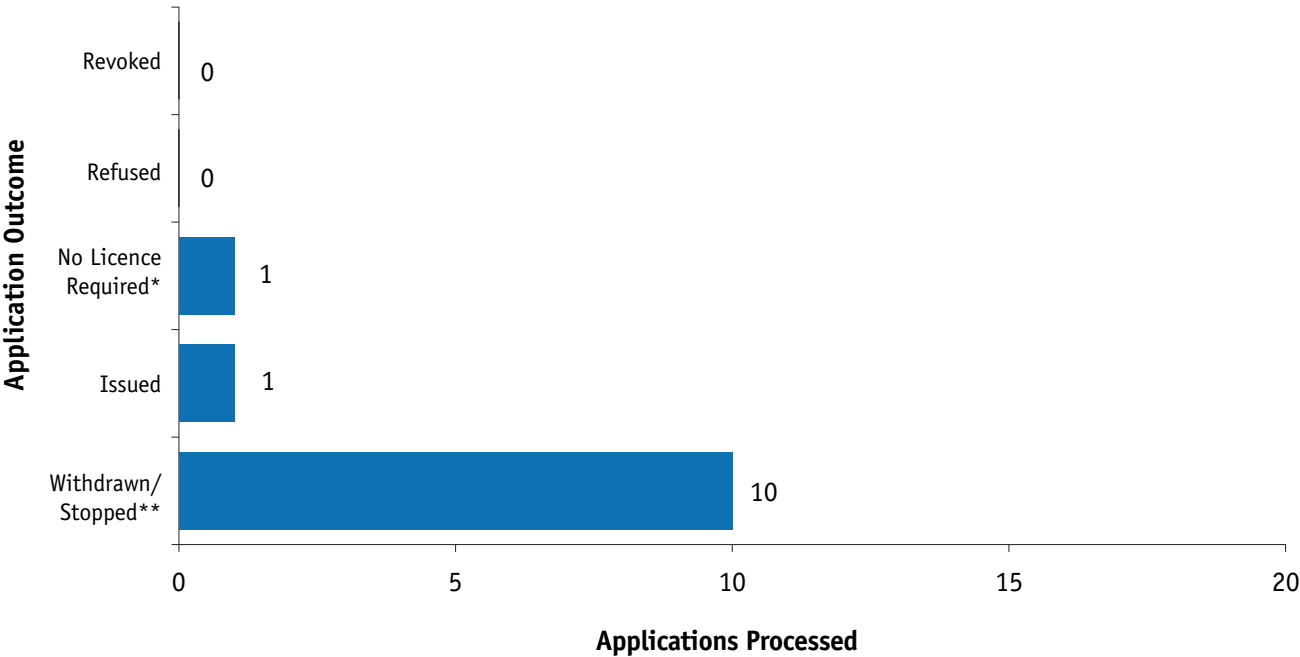
- Military List
- non-military items
- both (covering licences with a mix of military and non-military goods)
- items covered by the Torture Regulation and/or a mix of both Military List and non-military items

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 expected value stated by the exporter at the time of application – the value of goods exported in practice may well be lower. Licences are usually valid for 2 years and goods can be exported at any time during that period. In some cases, exporters will not need to carry out all (or sometimes any) of the exports authorised. Some items may be exported only temporarily and later returned to the UK within the validity of the licence. If permanent 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 published statistics.

Information is provided separately within the quarterly statistics on items licensed under SIELs that are intended to be incorporated into a good or product, for example sensors for a military aircraft being exported to an aircraft manufacturer in one destination, who intends to incorporate the items into the aircraft, before re-exporting the complete aircraft to an ultimate end-user destination. An aggregated summary of the ultimate end-user destinations for the goods, after incorporation, is included as part of the quarterly statistics data, published on GOV.UK.



Chart 2.2 Standard Individual Transshipment Licences (SITLs)

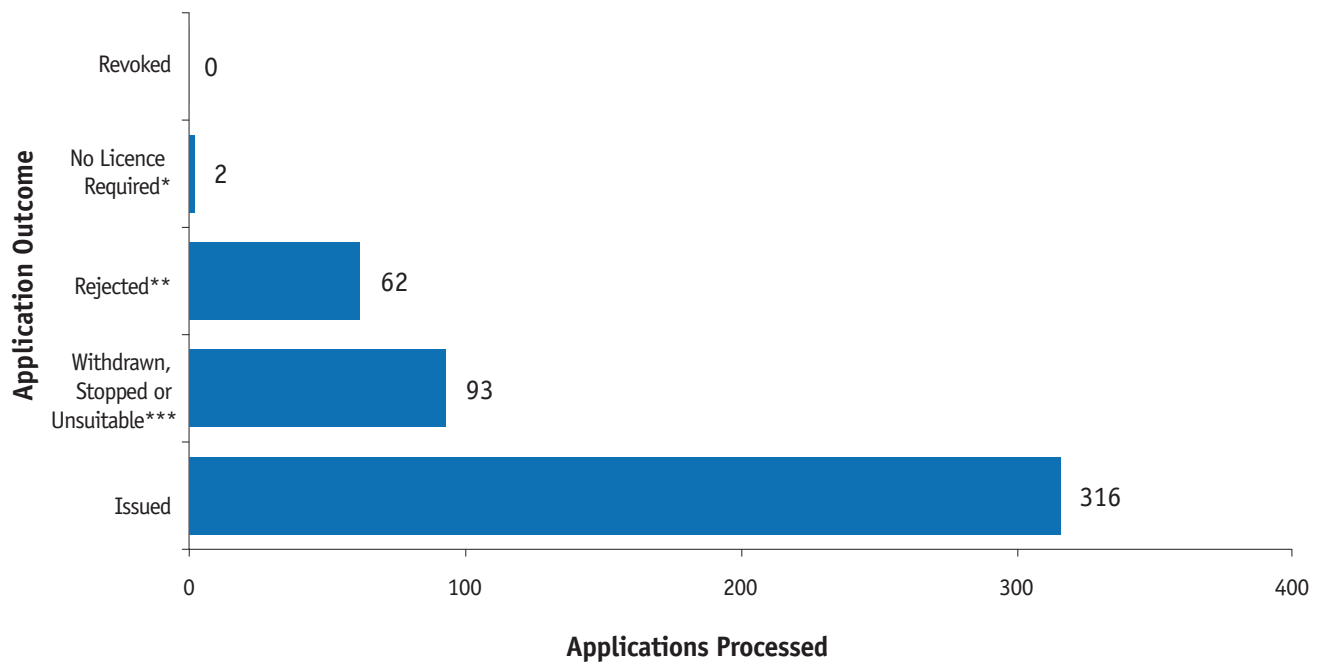


\* Some applications are submitted for goods that do not require an export licence. Where this is determined, the applicant is informed that no licence is required.

\*\* 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. The high proportion of applications withdrawn or stopped is typically because exporters apply for SITLs in error and then reapply for the correct licence type for their needs.

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 (rather than originating here), 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.

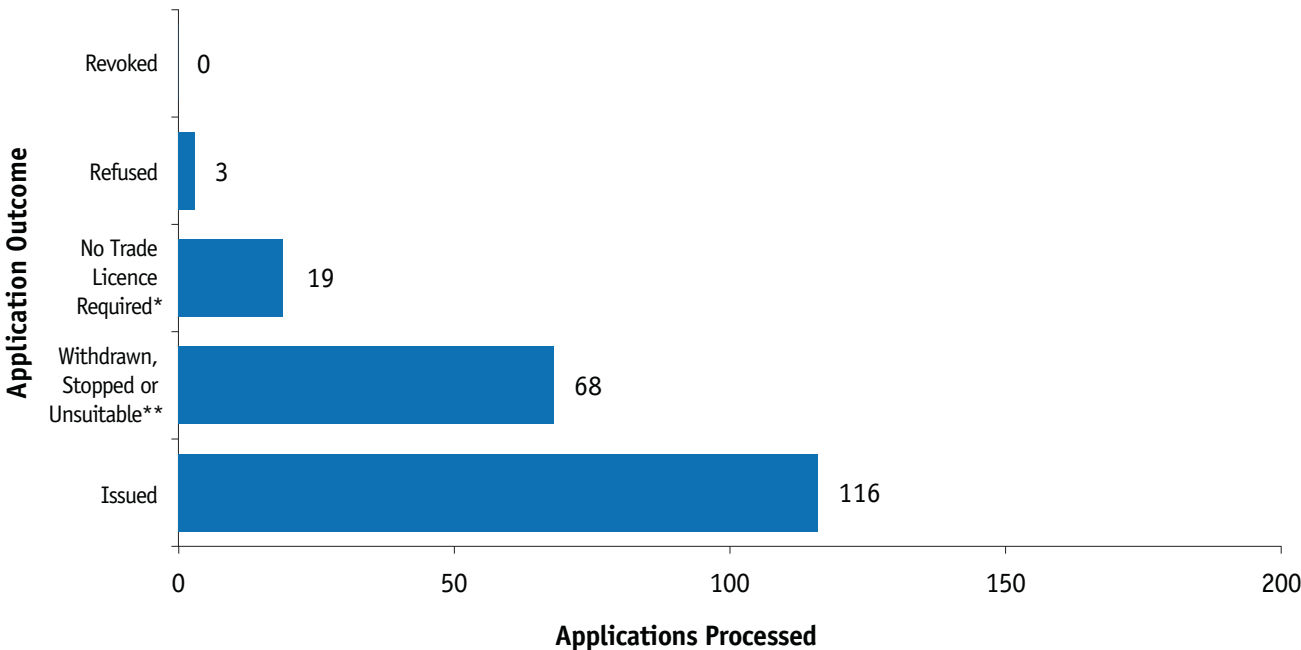
\*\*Some applications are not suitable for open individual export licences and may need the scrutiny that a standard individual export licence application provides to fully address and assess the risk. In such cases the OIEL application is rejected, and exporters are recommended to apply for SIELs.

\*\*\*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. 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 collected about open licence use, including within the development of LITE and a new Customs Declaration System (CDS). Once these new systems are in place, further options will be explored for greater transparency.

Chart 2.4 Standard Individual Trade Control Licences (SITCLs)

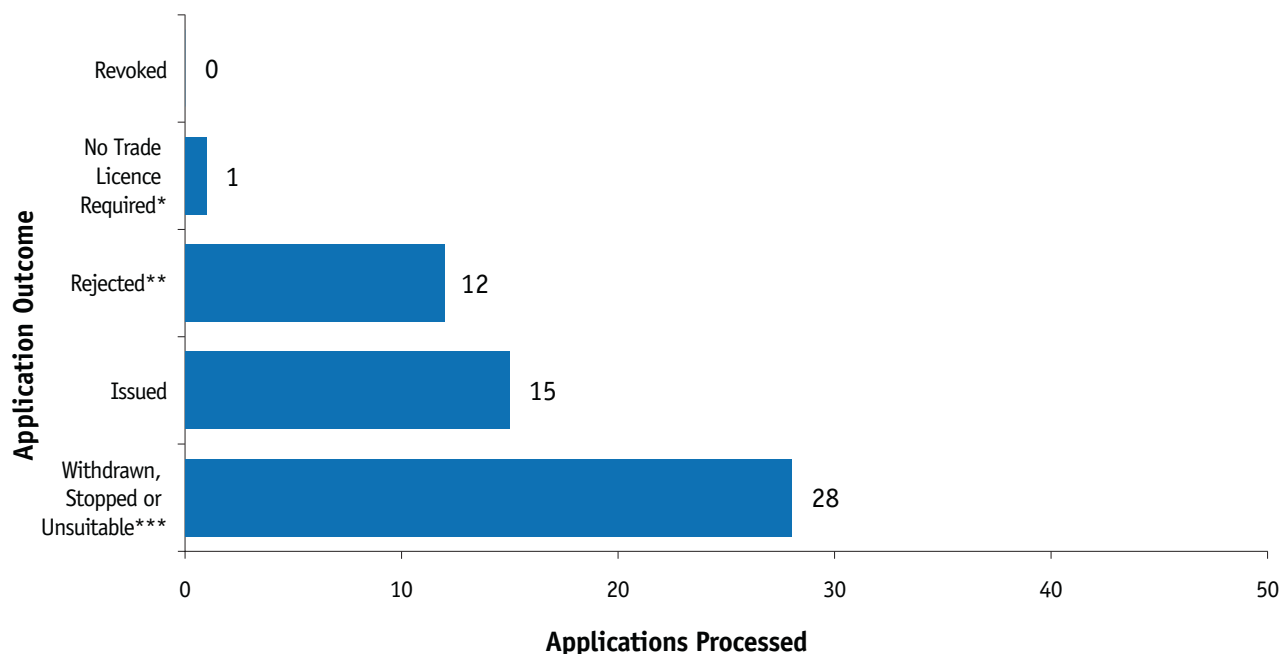


\* Some applications are submitted for goods that do not require a trade control licence. Where this is determined, the applicant is informed that no licence is required.

\*\* 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.<sup>14</sup>

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 aims to process 60% of OIEL applications within 60 working days.

<sup>14</sup> <https://www.gov.uk/government/publications/service-and-performance-code-for-export-licensing/ecju-service-and-performance-code>

Working closely with its advisory departments DBT monitors performance against its public targets on SIELs on a weekly basis, looking for trends or emerging issues that need to be addressed and prioritising resources across teams accordingly. There has been a particular focus on long outstanding applications (i.e. those over 60 working days) and a dedicated process established with advisory departments to monitor and scrutinise these cases and ensure they continue to be progressed. The effectiveness of the long outstanding case process was reviewed during 2023 and the recommendations implemented to further improve the approach which contributed to significant reductions in the long outstanding stock during 2024. During 2024, ECJU reduced the stock of SIEL cases over 60 days old by over 450 and will continue to focus efforts in this area. Reducing the stock of long outstanding cases is a positive step but it has a negative impact on ECJU's ability to meet our processing time targets as it results in larger volumes of cases completed outside of our 60 working day target. This is one of the reasons for the percentage of cases completed within 60 working days reducing from 87% in 2023 to 84% in 2024. Table 2.2 (SIEL and SITCL Processing Performance) gives a breakdown of the performance of HM Government in 2024 against the two main published SIEL targets. Information for 2022 and 2023 is also provided for comparative purposes.

**Table 2.2 SIEL and SITCL Processing Performance**

<b>Outcomes</b>	<b>2024 (SIELs*)</b>	<b>2024 (SITCLs)</b>	<b>2023 (SIELs*)</b>	<b>2023 (SITCLs)</b>	<b>2022 (SIELs)</b>	<b>2022 (SITCLs)</b>
Number of applications completed in 20 working days	6,539	122	7,746	115	10,676	108
% of applications completed in 20 working days	60%	57%	52%	59%	62%	53%
Number of applications completed in 60 working days	9,179	185	13,049	182	15,329	166
% of applications completed in 60 working days	84%	86%	87%	93%	89%	81%
Median processing time	16 days	17 days	20 days	15 days	16 days	20 days

\*SIEL figures for 2023 onwards do not include SIELs processed in LITE. In 2023, there were 1,143 SIELs closed in LITE that have not been included in these figures, accounting for 9% of all SIELs processed (in SPIRE and LITE) respectively. In 2024, there were 3,504 SIELs closed in LITE that have not been included in these figures, accounting for 31% of all SIELs processed (in SPIRE and LITE) respectively.

The key operational priorities for ECJU for 2024 continued to be adapting its processes to efficiently manage the impact of high volumes of complex applications; designing and implementing a wider array of live operational data to prioritise and target resources effectively; to deliver a consistent and efficient service across its legacy system, SPIRE and its new system, LITE; and to focus on the continued development of the new LITE service. Operational teams have also implemented a range of Continuous Improvement initiatives.

ECJU strives to meet its licensing targets and is extremely mindful of the commercial pressures that businesses face and recognises the need to process licence applications with minimum delay. However, some destinations or good types remain more challenging and will take longer than target times to complete as ECJU continues to maintain its robust export controls regime. ECJU receives an increasingly high proportion of complex applications, which require more time for robust assessments. 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 ECJU's performance against its targets.

Some of the specific challenges that influenced ECJU's operating context and impacted on its performance include:

- the development and expansion of HM Government's already extensive sanctions against Russia, which require detailed checks on licensing grounds
- careful consideration of goods destined for use by the Israel Defense Forces
- the continued impact of the revised Military End-Use Control (MEUC) and its 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 and new applications
- expediting 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 two different systems as there is a gradual transition from the legacy system, SPIRE to the 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 users but creates additional pressures on the teams' overall capacity during the design and implementation period.

Exporters are also developing their understanding of how to apply for export licences in LITE. This can lead to increases in the volume of 'requests for information' required to obtain all the relevant information to complete an assessment and can then result in an amendment to the case, creating additional delays in the process. These initial challenges are inevitable consequences of changing a well-established system but will be temporary. Once internal and external users become more accustomed to the system, supported by the guidance and user support, the benefits of this modernised, digital system, which aligns to GOV.UK standards, can be realised.

During 2024, ECJU-DBT was able to resolve the resourcing challenges of 2022-23, following further successful recruitment campaigns for Technical Assessment Officers, Case Officers, and Compliance Inspection Officers. ECJU-DBT further expanded its teams in the Darlington Economic Campus.

While there is still some way to go in meeting its public targets, ECJU has put in place many new measures and continuous improvement initiatives improving the operational teams' resilience. For example, there is now a dedicated data team providing a larger range of live data to monitor the application pipeline more effectively and take quicker steps to solve issues or re-prioritise resource. There are new processes embedded to scrutinise the stock of long outstanding case stocks and improve the efficiency of the process to manage the most challenging cases where a refusal is a potential outcome.

## 2.4 Refusals

There were 611 SIELs and SITCLs refused in 2024, compared with 690 in 2023. Table 2.3 contains the number of refusals per Criteria.

The SIEL refusal rate<sup>15</sup> has decreased from 4.5% of applications in 2023 to 4.3% in 2024. 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.

The strengthening of the Military End-Use Control (MEUC) in May 2022 has been a key contributor to the increase in licences refused since 2022. The combination of widening the scope of the control and extending it to include China led to an increase in export licence refusals on national security grounds in 2022. This trend continued in 2023 and 2024. The strengthened control led to refusals of exports of concern which presented risks to national security that could not have previously been prevented. The processing timeframes for these more complex applications are typically longer on average, which has also had a wider effect on processing performance more generally.

**Table 2.3\* Reasons for refusals of SIEL and SITCL applications**

Reason for refusal	2024	2023	2022
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	5	6	1
Criterion 1 – UK's commitments and obligations to observe UN, OSCE and UK arms embargoes	53	39	48
Criterion 1 – Announced national measures or restrictions	10	8	6
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	39	22	24
Criterion 3 – Preservation of internal peace and security	3	1	0
Criterion 4 – Preservation of peace and security	6	3	2
Criterion 5 – National security of the UK, as well as that of friendly and allied countries	180	175	94
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	486	321	199

<sup>15</sup> The refusal rate calculates all applications finalised as issued, refused or with a No Licence Required outcome.

Reason for refusal	2024	2023	2022
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	33	77	55
***Catch-all controls for non-listed items – Military End-Use	296	447	108

\* 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 each calendar year.

\*\* 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 for the new provisions of the MEUC, implemented in 2022, were first 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 assimilated 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 granted licences which are revoked in full or in part. This typically occurs when there is a change of circumstance in the recipient country, or when new controls, trade measures or sanctions are introduced, and the export is no longer consistent with the Criteria. There were no revocations of SIELs and SITCLs in 2024.

Although licence suspensions are not counted in the table below, these may be put in place in more volatile circumstances, leaving the possibility at the time of the decision that the licence may later be reinstated. Some licences to Israel were suspended in 2024 and more detail on these is provided in Section 7.2.

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 over the last 3 years.



**Table 2.4\* Reasons for revocations of SIEL and SITCL licences**

Reason for revocation	2024	2023	2022
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	0	1	0
Criterion 1 – UK’s commitments and obligations to observe UN, OSCE and UK arms embargoes	0	1	105
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	0	1	1
Criterion 3 – Preservation of internal peace and security	0	0	0
Criterion 4 – Preservation of peace and security	0	1	0
Criterion 5 – National security of the UK, as well as that of friendly and allied countries	0	1	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	0	2	1
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	0	0	0
***Catch-all controls for non-listed items – Military End-Use	0	0	0

\* Decisions to revoke extant licences 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 each calendar year.

\*\* 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 for the new provisions of the MEUC, implemented in 2022, were first 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 assimilated 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	2024	2023	2022
Number of Appeals received**	50	95	38
Number of Appeals finalised	72	50	19
Median processing time for finalised Appeals	106 days	80 days	46 days
Number of Appeals where refusal was upheld	68	46	18
Number of Appeals where refusal was overturned	5	4	1

\* Data is based on management information records as of 21 March 2025.

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

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. 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.

Following a sharp increase in the number of appeals received in 2023, there was a reduction in the number of new appeals received in 2024. Overall, there was an increase in the number of appeals finalised. This had an impact on timeliness and ECJU performance figures. 45 of the 68 (66%) appeals completed in 2024 related to the revised Military End-Use Control which came into force in 2022.

ECJU continues to review the appeals process, informing the development of this functionality in LITE. ECJU's ability to process appeals was affected by ongoing development of this functionality in 2024. By the end of the year, these problems had been resolved and the functionality now in place has improved the efficiency of the processing of appeals.

## 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). In October 2024, following the establishment of the Office of Trade Sanctions Implementation (OTSI), responsibility for issuing licences for the provision of sanctioned standalone services transitioned to OTSI. This included the transfer of 7 cases which had been submitted to ECJU. Where decisions have been made on those cases, the outcomes of these are listed below.

**Table 2.6 Other licence type decisions**

Licence application type	Licence sub-type	Issued	Refused	Revoked
Technical Assistance Licences	WMD (Weapons of Mass Destruction)	0	0	0
Technical Assistance Licences	Sanctions	1	0	0
Technical Assistance Licences	Energy related items under the Russia Sanctions	0	0	0
Technical Assistance Licences	Russia Sanctions – Other	4	1	0
Individual Financial Services Licences	Restricted goods and technology, luxury goods, iron and steel products, G7 dependency and further goods, Russia's vulnerable goods and Schedule 3DA revenue generating goods.	6	0	0
Individual Brokering Services Licences	Restricted goods and technology	1	0	0
Licences for multiple services – Financial Services, Brokering Services and Technical Assistance	N/A	2	0	0
Individual Licences for export-related activities	Restricted goods and technology, luxury goods, G7 dependency and further goods, and Russia's vulnerable goods	4	0	0
Syrian Humanitarian Licences	N/A	0	0	0
Licence under multiple sanctions regimes	Restricted goods and technology, luxury goods, G7 dependency and further goods, Russia's vulnerable goods and energy related goods.	1	0	0
Professional and Business Services (PBS) Licences*	N/A	25 (2)	2 (1)	1
Licences for drugs used in execution by lethal injection	N/A	36	0	0
Global Project Licences	N/A	0	0	0

\* Of the listed PBS licence outcomes, the results of the OTSI licence assessments are shown in brackets.

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

## 2.8 OGELs and Assimilated and Union General Export Authorisations

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

OGELs may be republished<sup>16</sup> 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.

In 2024, there were 71 OGELS in force, two of which were new. 24 OGELS were amended in 2024, with some more than once. Amendments are due to a variety of reasons including but not limited to the need to address changes to the control list; new permitted destinations following changes to collaborative defence programmes; and as part of a response to changing circumstances. Such revisions to OGELS may lead to changes to the permitted destinations and or changes to the scope of items permitted by the licence.

A summary of key changes affecting OGELs and other general licences in 2024 is set out in Annex C. A list of OGELs and other general licences in force in 2024 is set out in Annex D.

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<sup>16</sup> <https://www.gov.uk/government/collections/open-general-export-licences-ogels>

## Section 3:

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# Modernising ECJU

### 3.1 Improving the way ECJU works

ECJU continues to embed continuous improvement as a core aspect of operations. In 2024, there were significant efforts to communicate the continuous improvement process to staff and capture their ideas. This included “hackathon” style events that generated substantial engagement and idea generation, and contributions to the government wide “One Big Thing” initiative, which focused on innovation. To further support these efforts, ECJU members of staff were part of a continuous improvement working group with representatives from across the Export Control and Sanctions Directorate, of which ECJU is part, to consider and champion these ideas. Successful initiatives included piloting a more streamlined refusals process and a Learning & Development (L&D) programme to increase bite-sized learning for staff.

The focus throughout 2025 will be on refining processes and introducing an assurance framework to ensure the quality of these processes, as well as upskilling staff and improving the customer experience, in partnership with exporters.

### 3.2 Modernising the new online digital system for export licensing

The LITE programme transitioned from private beta to public beta in September 2024. This transition led to a rapid increase in the number of exporters using the system to apply for a SIEL. By the end of 2024 the majority (around 90%) of SIEL applications could be processed via LITE, with a few exceptions for specific scenarios. The goal is to reduce and remove these exceptions throughout 2025.

The LITE programme team has maintained extensive engagement with the industry through user research, face-to-face and online events, and collaboration with internal users across DBT and other government departments. Carefully listening to their feedback helps to secure continuous improvement to the service and development of enhanced or additional functionality.

Exporters using LITE during the public beta phase have been supported by a dedicated help desk, training videos, and guidance documents. As with the system itself, the user support service will be continually improved on the basis of feedback from exporters.

Looking ahead to 2025, further licence types will be developed in LITE and additional functionality for SIELs introduced.

## Section 4:

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# 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 Protocol on Ireland/Northern Ireland<sup>17</sup> and the Windsor Framework<sup>18</sup>, is also relevant.

Assimilated law relevant to export control is:

- the assimilated 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 Great Britain
- the assimilated 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 assimilated 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

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<sup>17</sup> <https://www.legislation.gov.uk/eut/withdrawal-agreement/attachment/1/adopted>

<sup>18</sup> <https://www.gov.uk/government/publications/the-windsor-framework>

**Table 4.1 Amendments to export control legislation in 2024**

Title	Reference	Description
The Export Control (Amendment) Regulations 2024	2024 No. 346	These Regulations amend the Export Control Order 2008 and 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 (Recast) (EUR 2009/428).
Commission Delegated Regulation (EU) 2024/2547 of 5 September 2024 amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items	Commission Delegated Regulation (EU) 2024/2547	Updates Annex I of Regulation (EU) 2021/821 for dual-use items subject to control when they are exported from or in transit through the United Kingdom in respect of Northern Ireland.

## Section 5:

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# External engagement

### 5.1 Parliamentary engagement

Until early 2024, Parliamentary oversight of export controls was conducted by the Committees on Arms Export Controls (CAEC), with members from the Foreign Affairs (FAC), International Development (IDC), Defence (DC) and the Business and Trade (BTC) Committees. In January 2024, the CAEC was dissolved and responsibility for the scrutiny of export controls was assumed by the BTC.

In May 2024, the then Minister for Industry and Economic Security Alan Mak MP, Deputy Foreign Secretary Andrew Mitchell MP, and Director-General Economic Security and Trade Relations Kate Joseph gave oral evidence to the BTC, as part of a non-inquiry session into UK Arms Exports to Israel.

In May 2024, ECJU officials hosted members from the BTC, and FAC at DBT's offices for a briefing on export control and sanctions policy and implementation developments.

In December 2024, following the General Election, the Minister of State for Trade Policy and Economic Security Douglas Alexander MP, Minister of State for Europe, North America and Overseas Territories Stephen Doughty MP, and Minister of State at Ministry of Defence, Lord Coaker gave oral evidence to the BTC on UK arms exports to Israel. They were accompanied by Director-General Economic Security and Trade Relations (DBT), Kate Joseph, Director for Defence and International Security (FCDO), Stephen Lillie, and Head of Global Issues, Security Policy and Operations Directorate (MOD), Stuart Mills.

Since then, ECJU has continued to engage with the Committee by providing detailed responses to queries raised by the Committee regarding arms export controls.

### 5.2 Raising awareness of export licensing with industry and academia

During 2024, 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.



There were 31 Notices to Exporters<sup>19</sup> 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, new licensing and customs digital platforms, as well as actions taken by HMRC, including:

- launch of the 'Apply for a SIEL' service in LITE
- an update on the AUKUS reforms and publication of the new AUKUS open general licence
- export declarations moving from CHIEF to CDS
- compound settlements and prosecutions due to breaches of strategic export controls
- amendments to OGELs and the strategic export lists

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

- The Home Office event "Security and Policing", hosted by the Joint Security and Resilience Centre
- Farnborough International Airshow
- Higher Education Export Control Association annual conference
- SAE Media Group's 'Defence Exports Conference'
- The Defence Procurement Research Technology and Exportability (DPRTE) event
- UK Defence and Security Exports (UK DSE) Small to Medium Enterprises (SME) surgeries

ECJU ran a joint Civil Nuclear Exports event with DESNZ, supported by the Office for Nuclear Regulation (ONR) and industry. This event on 21 May 2024 in Manchester attracted over 100 participants.

On 15 October 2024, ECJU also hosted its annual Export Controls and Sanctions Symposium in London supported its advisory departments, including HMRC, the FCD0, and the MOD, as well as by the aerospace, defence, security and space trade association ADS. This attracted over 300 participants and provided updates on the UK's export control priorities, the ECJU LITE programme and introduced the newly established OTSI.

The recorded webinars on GOV.UK<sup>20</sup> were viewed over 20,000 times. The training bulletin 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.

In 2024, the ECJU MOD Team with support from other ECJU colleagues continued to work closely with Industry Partners on their licensing and security release requirements for both industry and HMG led Export Campaigns. This activity included support for the Global Combat Air Programme (GCAP) which entailed close working with industry partners in the UK, Japan and Italy as well as the Japanese and Italian Governments.

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.

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19 <https://www.gov.uk/government/collections/notices-to-exporters#notices-to-exporters-2024>

20 [https://www.youtube.com/playlist?list=PLx8TFJYkqt4\\_8Mv364DJzTOUUKBdRDzju](https://www.youtube.com/playlist?list=PLx8TFJYkqt4_8Mv364DJzTOUUKBdRDzju)

From April 2024 (when new records were started), the Export Control Helpline received 2,416 calls and 18,767 e-mails. The helpline provides support to exporters on many aspects, including export controls, ongoing applications, open licences, customs declarations and support with SPIRE. The new LITE platform support service received 10,317 enquiries over the same period.

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.

### **5.3 International Outreach**

HM Government personnel engaged in various in-person international outreach activities throughout the year. In February, the Director for Export Controls and Sanctions gave a keynote address to the 30th Asian Export Control Seminar in Tokyo on the topic of the UK's Inter-Agency approach to Strategic Trade Controls and Counter-Proliferation Finance. Also in February, ECJU participated in discussions on export controls at the meeting of the CBRN (Chemical, Biological, Radiological and Nuclear) Working Group in Rome, part of the Global Partnership against the spread of Weapons and Materials of Mass Destruction. ECJU also engaged in discussions and sharing good practice, related to defence technologies, cyber security and defence information management at the Defense Technology Security Conference hosted in Seoul in July.

### **5.4 Internet-based guides and licensing tools**

Information about export controls is hosted on GOV.UK.<sup>21</sup> 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.<sup>22</sup>

Exporters can make use of two 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.<sup>23</sup> 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.

### **5.5 Advisory Services**

#### **The End-User Advisory Service**

Exporters can use this service to request advice on whether ECJU has WMD or MEUC concerns related to specific organisations or persons with whom they wish to do business. After an assessment of these end-users, if ECJU has concerns, then a WMD or MEUC 'Concerns' letter is sent to the exporter who requested the advice. This obligates them to apply for an export licence for the export of goods which would otherwise not be controlled.

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<sup>21</sup> <https://www.gov.uk/government/organisations/export-control-joint-unit>

<sup>22</sup> <https://www.exportcontrol.db.trade.gov.uk/sdb2/fox/sdb/SDBHOME>

<sup>23</sup> <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>

As this is a non-statutory advisory service there are no published targets for responses to End-User Advice enquiries. During 2024 ECJU finalised 10,029 enquiries, a decrease from 12,970 enquiries in 2023.

2,049 WMD and MEUC 'Concerns' letters were sent in 2024. This compares to 1,549 in 2023, and 1,155 in 2022. This continued increase in 'Concerns' letters 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.<sup>24</sup>

In the 12-18 months which followed the introduction of the MEUC changes in May 2022, End-User Advice Enquiries increased. This volume is now starting to decrease. End-User Advice Enquiries relating to China increased from 4,672 in 2022, 4920 in 2023 and then decreased to 3,692 in 2024.

The downward trajectory in 2024 is likely to be a result of the new guidance about validity of end-user advice published in November 2023 in a Notice to Exporters (NTE2023/21<sup>25</sup>). This NTE provided exporters with additional guidance on when to submit enquiries and clarified for how long this advice will continue to apply. This advice, alongside increased familiarity with enhanced MEUC, appears to have reduced the need for exporters to submit repeat enquiries and therefore contributed to a reduction in overall volume of enquiries in 2024.

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

25 <https://www.gov.uk/government/publications/notice-to-exporters-202321-end-user-advisory-service/nte-202321-end-user-advisory-service>

## Section 6:

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# 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 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 2024, 19 applications to gift equipment (to countries other than Ukraine, which is covered in Section 7.1) were approved. 5 of those applications were in pursuit of the aims established by the Conflict, Stability and Security Fund (CSSF) or the UK Integrated Security Fund (UKISF). The UKISF replaced the CSSF in April 2024<sup>26</sup> so this reporting period covered gifting from both funds. The UKISF and CSSF provide 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 UKISF and 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 or dual-use equipment, including gifts funded through UKISF or CSSF, are assessed on a case-by-case basis against the Criteria, in the same way as export licence 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 is provided by 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.

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<sup>26</sup> <https://www.gov.uk/government/organisations/uk-integrated-security-fund>

**Table 6.1\* Gifted controlled equipment in 2024**

Country	End-User	Goods Description	Sponsoring Department	Approx. Value £
Jamaica	Law Enforcement	1 x dual-use mapping drone	Home Office	10,000 **
Albania	Law Enforcement	1 x inspection / sensing drone with accessories, including camera	Home Office	420,000 **
Occupied Palestinian Territories	United Nations	2 x Civilian Armoured Vehicle, Diesel, Toyota Landcruiser 200  1 x Civilian Armoured Vehicle, Petrol, Toyota Land Cruiser 300  1 x Civilian Armoured Vehicle, Diesel, Toyota Landcruiser 200  1 x Armoured Vehicle, Diesel, Toyota Landcruiser 200	Foreign, Commonwealth & Development Office	717,640 ***
Occupied Palestinian Territories	United Nations	3 x Civilian Armoured Vehicles -Toyota Land Cruisers 300	Foreign, Commonwealth & Development Office	487,440 ***
Morocco	General Directorate National Security	Goods for Counter-Improvised Explosive Device (C-IED) development activity	Ministry of Defence	66,300
Brazil	Brazilian Federal Police	2 x dual-use mapping drones	Home Office	13,730
Paraguay	Paraguayan National Police	2 x dual-use mapping drones	Home Office	13,730
Argentina	Argentine Federal Police	8 x dual-use mapping drones	Home Office	27,460
Tunisia	Programme Director Tunisian C-IED Centre of Excellence	Counter-improvised explosive device equipment	Ministry of Defence  (gift funded by NATO)	83,140
Somalia	Somali Ministry of Defence	Goods for Counter-Improvised Explosive Device (C-IED) development activity	Ministry of Defence	418,430**

Country	End-User	Goods Description	Sponsoring Department	Approx. Value £
Somalia	Goodir Unit of the Somalia Police Force	Ammunition and personal protective equipment for training and conduct of human rights compliant operations	Foreign Commonwealth & Development Office	79,120
Somalia	Somali National Army	Goods for Counter-Improvised Explosive Device (C-IED) development activity	Ministry of Defence	210,540**
Moldova	Ministry of Defence of Republic of Moldova	1 x dual-use Analytics Software (AI software)	Ministry of Defence	45,000
Moldova	Ministry of Defence of Republic of Moldova	Thermal sensing drone	Ministry of Defence	21,480
Falkland Islands	Falkland Islands Museum & National Trust	Sea Harrier FA2 – ZH801 (Badged as ZH800)	Ministry of Defence	26,220
Falkland Islands	Falkland Islands Museum & National Trust	Lynx Mk8 helicopter, (Badged as XV725)	Ministry of Defence	10,000
Ghana	Ghanian Armed Forces	Protective and defensive kit to complement capability building training	Ministry of Defence	260,000**
Turks and Caicos Islands	HMP Grand Turk	12 x Escort Handcuffs – 9 LIFT  12 x Handcuff Key (9 Slider)	Ministry of Justice	2,720**
Nigeria	Nigerian Armed Forces	Goods for Counter-Improvised Explosive Device (C-IED) development activity	Ministry of Defence	400,000

\* 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 8 April 2025

\*\* Equipment purchased through the Conflict, Stability and Security Fund (CSSF) or UK Integrated Security Fund (UKISF).

\*\*\* Equipment purchased through UK Humanitarian Support in the Occupied Palestinian Territories<sup>27</sup>

27 <https://devtracker.fcdo.gov.uk/programme/GB-GOV-1-400022/summary>

## 6.2 Government to Government Exports

The Defence Equipment Sales Authority 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 sets out these exports delivered in 2024 by destination, equipment type and quantity and with a minimum value of £1m.

**Table 6.2\* Disposals to foreign armed forces**

Country	Type of Equipment	Quantity
Australia	Ex Project Matcha H135 Helicopters (Resale)	5
USA	C130 Aircraft Centre Box Wing (Resale)	1
Romania	SeaFox UUV (Resale)	3
India	Aerospace Technical Expertise Transfer	N/A

\* Data is based on Management Information records as of 8 April 2025

**Table 6.3\* Other overseas transfers to commercial entities**

Country	Type of Equipment	Quantity
France	E3D Sentry Aircraft Inventory (Resale)	Inventory – multiple lines

\* Data is based on Management Information records as of 8 April 2025

## 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.

During 2024, the UK continued to provide substantial support for in-service aircraft, naval vessels and their associated systems. 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, published on GOV.UK

## Section 7:

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# 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.

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

- UK defence stocks
- rapid procurement from UK and overseas defence industries
- purchasing equipment from global commercial stockpiles
- coordinated international procurement through the UK-led International Fund for Ukraine and the Drone Capability Coalition

Alongside these efforts, HM Government has invested significantly in equipment support so that Ukraine is able to service and repair equipment the UK has previously gifted to Ukraine.

Recognising the UK as a major exporter of defence equipment, UK Defence & Security Exports (DSE) 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 MOD.

As the licensing authority for strategic export controls, the ECJU team within DBT has 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. These cases have been prioritised and treated these as priority cases HM Government publishes comprehensive quarterly statistics on data about decisions made on licence applications including those issued, refused, rejected, or revoked to all destinations, including Ukraine. These quarterly statistics contain detailed information, including the overall value, type and a summary of the items covered by these licences. 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 their sovereign country. End-User Undertakings have been provided by the Ukrainian Armed Forces upon receipt of lethal aid.

The MOD gifted the following controlled equipment to the Government of Ukraine in 2024<sup>28</sup>:

- approximately 1,000 short and medium range surface-to-air missiles including LMM, as well as several air defence systems
- dozens of artillery systems, and more than 160,000 artillery rounds
- more than 600 armoured vehicles, protected mobility and logistic support vehicles
- over 5,000 units of communication, SATCOMS, radar, electronic warfare, GPS systems and surveillance and targeting equipment
- over 6,500 infrastructure and engineering items including generators, maintenance and bridging capabilities
- more than 8,500 uncrewed systems
- approximately 8,500 spares, vehicle spares, ancillaries, parts, tools, support kits, medical items and PPE
- approximately 40,000 weapons systems including small arms
- approximately 7 million rounds of ammunition including small arms ammunition and anti-armour weapons
- over 3,000 items of maritime equipment including boats, spares and lifesaving items
- Long range missiles and 5,330 sets of F-16 protective countermeasures

## 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 which continued on an ongoing basis. This internal policy 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.

The FCDO established an International Humanitarian Law (IHL) Compliance Assessment Process for assessing 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 across the FCDO and overseas missions; reporting in the media; statements from the UN, NGOs and other organisations; and reporting from HM Government 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.

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<sup>28</sup> The figures are unlikely to align with public announcements as the majority of UK government announcements on support to Ukraine refer to Financial Years, not calendar years.

On day one of this government, the Foreign Secretary ordered a review into Israel's compliance with IHL. The review concluded that there was a clear risk that UK exports for the IDF in the Gaza conflict might be used to commit or facilitate serious violations of IHL. As a result, we took decisive action, stopping exports to the IDF that might be used to commit or facilitate serious violations of IHL in Gaza. The suspension covers all items that were assessed as those which might be used in Israeli military operations in the Gaza conflict. Suspended licences include export licences for fighter aircraft (F-16s), parts for Unmanned Aerial Vehicles (UAVs), naval systems, and targeting equipment. We have successfully implemented that suspension and continue to refuse all relevant licence applications. In 2024, we refused more licence applications for Israel than in 2020 to 2023 combined.

As set out in Parliament, it is not currently possible to suspend licensing of F-35 components for use by Israel without prejudicing the entire global programme, which would have serious implications for international peace and security due to its crucial strategic role in the defence of NATO and other UK allies. However, we have suspended direct exports of F-35 parts for use by Israel. Where UK-produced parts go to the global spares pool, Israel operate a small proportion of over 1,000 F-35s in the global fleet. Subject to these specific measures, we are clear there are no export licences currently being used by the Israeli Defence Force in military operations in Gaza.

## Section 8:

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# UK and International Policy developments

### 8.1 Military End-Use Control (MEUC) and Emerging Technologies Reviews

On 19 May 2022, the UK enhanced the MEUC 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.

In line with its commitment to keep licensing under review to keep pace with technological and geopolitical developments, during 2023 ECJU began an internal review of the operation of the MEUC. This review looked at its effectiveness in preventing exports of concern, as well as its impact on both the licensing process and how it affected UK exporters. ECJU has continued to analyse the impact and consequences of this new control.

The previous Government's 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. As a result, ECJU embarked on a review which aims to assess whether the UK's export control regime was keeping pace with emerging technologies of critical interest to the UK, from the perspective of national security and human rights.

It was not possible to conclude the reviews on the MEUC and Emerging Technologies and engage with affected businesses on findings because of the 2024 General Election. ECJU has continued its analysis, and it will be for Ministers to consider decisions on next steps, including engagement with exporters.

To address threats from certain emerging technologies, new controls on UK controlled dual-use goods were introduced in April 2024 which the United Kingdom, along with a number of other like-minded countries, has committed to implement. The new controls were related to quantum technologies, including dilution refrigerators, semiconductor technologies, and advanced materials.

## 8.2 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. On 2 April 2014 the UK ratified the ATT and it entered into force on 24 December 2014. On 31 December 2024, the Treaty had 115 States Parties.

The UK has continued to play a leading role in the ATT. In August 2024, the Tenth Conference of States Parties (CSP10) to the ATT took place. The Conference welcomed a Political Declaration introduced by the UK on the next decade of the ATT, which was endorsed by over 70 States Parties.

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

The UK also encourages 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 which covers authorised and actual exports of conventional arms covered under Article 2(1) of the Treaty during the calendar year 2024.

## 8.3 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.

In June 2024, the Fourth Review Conference of the United Nations Programme of Action to Prevent, Combat, and Eradicate the Illicit Trade of Small and Light Weapons in All Its Aspects (UNPoA) and the International Tracing Instrument (ITI) took place. 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 SALW, from production, transfer, possession, storage and eventual disposal. In addition, they promote law enforcement cooperation to disrupt illicit trafficking networks. At the Fourth Review Conference, governments agreed to the establishment of an Open-Ended Technical Export Group to ensure the full and effective implementation of the UNPoA/ITI in relation to emerging technological developments. The UK regularly reports on the implementation of international instruments to promote transparency and 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>

## 8.4 UN Register of Conventional Arms (UNROCA)

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

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

It also includes an additional '+1' category covering small arms and light weapons. The UK submits an annual report to UNROCA 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, and information on imports of some larger systems.

Every 3 years the UN brings together a Group of Experts on the continuing operation of UNROCA and its further development. The UK provided an expert to the 2025 GGE which began in December 2024 looking at ways to update and improve the use, participation and scope of UNROCA.

The UK actively encourages all UN Member States to make reports with similar levels of transparency and to report regularly. Transparent systems, underpinned by strict export controls, are less vulnerable to exploitation and manipulation. Previous and current UK national reports are available at: <https://www.unroca.org/>

## 8.5 Nuclear Suppliers Group (NSG)

The NSG<sup>29</sup>, 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. In 1994, the NSG 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 2024, there were 48 Participating Governments with the European Commission and the Chair of the Zangger Committee participating as observers.

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29 <https://www.nuclearsuppliersgroup.org/index.php/en/about/about-the-nsg>

The NSG held its Consultative Group meetings in Vienna (8 to 9 April and 25 to 26 November 2024); and Rio de Janeiro (8 to 10 July 2024) and its Plenary in Rio de Janeiro (11 to 12 July 2024). The Group also held technical meetings in Vienna (10 to 11 April, and 27 to 28 November 2024) 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.

## **8.6 Zangger Committee**

The Zangger Committee, 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”.<sup>30</sup> 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 United Nations in Vienna, acts as the secretariat for the Zangger Committee.

The Zangger Committee held its annual meeting in Vienna on 26 November 2024. 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.

## **8.7 Australia Group (AG)**

The AG 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. Coordination of national export control measures assists AG participants in fulfilling their obligations under the Chemical Weapons Convention (CWC) and the Biological and Toxin Weapons Convention (BTWC).

The AG met in Paris in June 2024 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. Noting the AG’s Common Control Lists serve as a benchmark for global best practice, participants continued their work to refine controls applied to the chemical and biological items on the lists. This included updates to the AG’s Common Control Lists in response to emerging threats. During the meetings, participants updated the Factors for Consideration (FFC)<sup>31</sup> for assessing the inclusion, modification,

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<sup>30</sup> <http://zanggercommittee.org/>

<sup>31</sup> <https://www.dfat.gov.au/publications/minisite/theaustraliagroupnet/site/en/factors-for-consideration.html>

or removal of items on the AG's Common Control Lists, to ensure that the lists remain relevant, appropriate, and enforceable, and able to adapt to emerging agents, precursors, equipment and technologies that enable CBW development and use.

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 discussed dual-use research of concern, advances in synthetic chemistry, DNA synthesis, artificial intelligence and automation.

## **8.8 Missile Technology Control Regime (MTCR)**

The MTCR<sup>32</sup> is a politically binding instrument formed in 1987. As of 31 December 2024, the MTCR had 35 Participating States working together to prevent the proliferation of unmanned delivery systems capable of delivering weapons of mass destruction 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.

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

This year, the MTCR plenary was disrupted due to a lack of consensus on which Participating State would take over as the chair of the MTCR. However, the UK was represented in all of the technical discussions that took place over the course of the year. The UK conducted bilateral and multilateral meetings throughout the year to discuss MTCR policy with partners.

## **8.9 Wassenaar Arrangement (WA)**

The WA<sup>33</sup> 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 2024, 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 two 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 disruptions this year and the UK was represented at all meetings and delivered presentations. The UK conducted bilateral meetings in the margins of the WA Plenary, and multilaterally to discuss WA policy with partners.

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<sup>32</sup> <https://mtcr.info/>

<sup>33</sup> <https://www.wassenaar.org/genesis-of-the-wassenaar-arrangement/>



## 8.10 The Hague Code of Conduct (HCoC)

The Hague Code of Conduct against Ballistic Missile Proliferation (HCOC) is the result of efforts of the international community to internationally regulate the area of ballistic missiles capable of carrying weapons of mass destruction. Along with the MTCR, the HCOC is the only multilateral transparency and confidence building instrument concerning the spread of ballistic missiles.

By subscribing to the HCoC, member states voluntarily commit themselves politically to provide pre-launch notifications on ballistic missile and space-launch vehicle launches and test flights. Subscribing States also commit themselves to submit an annual declaration of their country's policies on ballistic missiles and space-launch vehicles.

Since the signing and entering into force of the politically binding HCOC in November 2002 in The Hague (Netherlands) the number of signatories has increased from 93 to 145. The UK helped found the HCoC on 25 November 2002 and continues to provide pre-launch notifications and an annual declaration each year.

The UK continues to actively engage with the HCoC including attending the annual conference in Vienna between 4 and 5 June 2024



## Section 9:

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# 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 Inspectorate Unit undertakes 3 types of scheduled contact with exporters:

- i) first compliance contact: with the aim to conduct this after the first registration with, or issuance of, the licence(s)
- ii) 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
- iii) 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 Inspectorate use 4 predefined criteria, agreed with HMRC, to determine the level of compliance and to ensure a consistent approach.

The pre-defined criteria are:

- compliant: where all documentation is fully in order
- generally compliant: where minor errors (for example, typographical) are identified on undertakings and/or licence identifiers on documentation
- 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

- 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 onsite 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 can be undertaken via video calls.

Since June 2024, ECJU has started undertaking first contacts with new holders of relevant licences. 36 companies were contacted 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 continue to be subject to remote compliance inspections for trade or trafficking and brokering activities. In these cases, the business is required to send a log of its activities and any supporting information or documentation required by the licence utilised to the ECJU Compliance Inspector for review.

In 2024 the Compliance Unit continued to focus on priority sites to visit, including those that had not had an inspection for a number of years. Tables 9.1 to 9.5 show compliance levels for sites inspected in 2024. Information for 2023 and 2022 is also provided for comparative purposes.

The focus for 2024 was to maintain priority targeted and intelligence led audits, as well as training the new inspectors alongside experienced officers on the more routine visits. The compliance team have also been able to increase the number of inspections by 10% since 2023, see Table 9.1.

The Compliance Team ran 3 educational workshops at the Export Control and Sanctions Symposium in London in October 2024 to support industry with their Open General Licence usage and reporting requirements. The sessions were aimed at those companies new to using Open Licences and over one hundred companies in total joined the sessions.

**Table 9.1\* Compliance checks undertaken**

Outcomes	2024	2023	2022
Number of compliance checks undertaken	270	244	377

\* Data is based on management information records as of 1 April 2025.

**Table 9.2\* Compliance checks – substantive infractions**

Outcomes	2024	2023	2022
Number of warning letters	41	42	54
Number of suspensions	0	1	1

\* Data is based on management information records as of 1 April 2025.

The Compliance Team issued 41 warning letters for non-compliant outcomes to company directors during 2024, 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 2024 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 – outcome of first-time compliance checks**

Outcome of first-time compliance checks	% (count) 2024	% (count) 2023	% (count) 2022
Compliant	29% (15)	36% (17)	62% (23)
Generally compliant	25% (13)	34% (16)	11% (4)
Not fully compliant	24% (12)	15% (7)	11% (4)
Non-compliant	22% (11)	15% (7)	16% (6)

\* Data is based on management information records as of 1 April 2025.

**Table 9.4\* Compliance checks – outcome of routine compliance checks**

Outcome of routine compliance checks	% (count) 2024	% (count) 2023	% (count) 2022
Compliant	31% (52)	33% (53)	39% (90)
Generally compliant	21% (34)	30% (48)	21% (48)
Not fully compliant	28% (47)	15% (25)	20% (45)
Non-compliant	20% (33)	22% (35)	20% (45)

\* Data is based on management information records as of 1 April 2025.

**Table 9.5\* Compliance checks – outcome of revisits**

Outcome of revisits	% (count) 2024	% (count) 2023	% (count) 2022
Compliant	67% (29)	75% (27)	68% (76)
Generally compliant	11% (5)	17% (6)	14% (16)
Not fully compliant	11% (5)	5% (2)	10% (11)
Non-compliant	11% (5)	3% (1)	8% (9)

\* Data is based on management information records as of 1 April 2025.

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

HMRC continued to work with Border Force and UK prosecuting authorities<sup>34</sup> to undertake a wide range of enforcement activity throughout 2024. This activity included:

- 199 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 9.7)
- 103 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
- 14 compound settlements issued by HMRC, totalling £5,069,157.20 for unlicensed exports of military goods, dual-use goods and sanctioned goods and related activity
- 167 HMRC warning letters issued as a result of voluntary disclosures.
- 5 positive charging decisions by prosecuting authorities for cases that are pending trial, and one conviction in 2024

HMRC assesses all breaches of arms export controls, as well as sanctions breaches which fall within its customs remit<sup>35</sup>. 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.

A total of 51 criminal investigations were ongoing in 2024. The outcome of most of these cases can be seen in the tables below. Of these 51 criminal investigations, 5 are awaiting trial in the courts following a positive charging decision issued by the Crown Prosecution Service / Crown Office and Procurator Fiscal, one trial was concluded and resulted in a conviction (Table 9.8 refers) and 14 cases resulted in a compound settlement. The remaining investigations are ongoing.

34 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)

35 As of 10 October 2024, OTSI is responsible for civil enforcement of certain trade sanctions, including services and the movement of goods involving UK companies and persons which do not cross the UK border

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 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 9.6 shows the outcomes of voluntary disclosures made in 2024.

The Fraud Investigation Service increased the number of investigators working on export control and sanctions cases by 40 in the period and secured funding under the Economic Deterrence Initiative for further growth.

**Table 9.6\* Voluntary disclosures outcomes in 2024**

Disposal	Total		
	2024**	2023	2022
Voluntary Disclosures received	310	260	317
Warning Letters issued as a result of voluntary disclosures	167	216	123
No Further Action (NFA) letters issued***	68	105	61
Compound settlement offers issued as a result of voluntary disclosures	14 offers totalling £5,069,157.20	9 offers totalling £2,276,390.77	22 offers totalling £6,900,587.14

\* Data is based on Management Information records as of 23 May 2025

\*\* Results based on actions taken in 2024.

\*\*\* Where no offence has been identified, lack of sufficient evidence, or not attributed to the exporter.

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 9.7\* Number of HMRC Strategic Exports and Sanctions Seizures**

Year	Total
2024	199
2023	266
2022	177
2021	202
2020	160

\* Data is based on Management Information records as of 23 May 2025.

**Table 9.8\* Convictions**

Year	Goods	Destination	Individual / company	Offence	Penalty
2024	Specialised equipment for military training or for simulating military scenarios.	Qatar	EDM Limited	Export of controlled goods, military listed goods to Qatar contrary to Customs and Excise Management Act 1979 68(1)	£80,000 penalty, and a further £9,359.80 in costs.
2023	N/A	N/A	N/A	N/A	N/A
2022	4 kg disodium sulphide hydrate	Pakistan	WWR International Ltd	Export of controlled chemicals contrary to Customs and Excise Management Act 1979 68(1)	£1,000, reduced for early plea £660 + costs £2,650.50
2021	N/A	N/A	N/A	N/A	N/A
2020	N/A	N/A	N/A	N/A	N/A

\* Data is based on Management Information records as of 23 May 2025.

# Section 10:

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## Case Studies

This section contains 2 case studies to illustrate some of the issues that ECJU needs to address when considering export licence applications against the Strategic Export Licensing Criteria.

### 10.1 Syria

During 2024, appalling human rights continued to dominate life in Syria with widespread issues such as arbitrary detention, and severe restrictions on civil and political rights. The Assad regime remained the main perpetrator of these violations, until its collapse in December, but abuses were also committed by proscribed terrorist organisations and other armed groups. Syria is subject to UK sanctions, as set out in The Syria (Sanctions) (EU Exit) Regulations 2019. The Regulations are not a full arms embargo but allow for targeted sanctions on entities and individuals<sup>36</sup>.

Over the course of this period, applications for Syria were considered against several criteria. Criterion 1a provides that the Government will not grant an export licence for Syria if to do so would be inconsistent with, inter alia, national sanctions observed by the UK or other relevant international commitments; Criterion 2 (risks regarding internal repression and violations of international humanitarian law); and, the risk of diversion under Criterion 7, due to the wide range of state, non-state and hybrid actors active in the region. Assessments were informed by analysis from FCDO subject matter experts and media and NGO reporting.

On 27 November, Syrian opposition groups led by Hayat Tahrir al-Sham (HTS) – at the time a proscribed terrorist organisation – and the Turkish-backed Syrian National Army (SNA) launched a military offensive against Syrian government forces. The offensive culminated in early December with the capture of Damascus and the collapse of the regime, ending over 50 years of rule by the Assad family in Syria. ECJU-FCDO immediately initiated a Change in Circumstances (CiC) review of extant export licences. A CiC process would ordinarily be triggered by events such as excessive force in managing protests; coup d'états; changes to sanctions; or internal conflict; or conflict with a neighbouring country. In this case, the change in regime necessitated a CiC, which found very few remaining (or extant) licences for Syria (for humanitarian, medical, and peacekeeping purposes), and that they were consistent with the Criteria. Any new licences for Syria are kept under careful

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<sup>36</sup> <https://www.gov.uk/government/speeches/update-on-uk-syria-sanctions-regime-minister-doughty-statement>

and continual review as standard. Questions remain regarding the fate of the Assad regime's stockpile of chemical weapons, human rights, the rights of different religious and ethnic groups, and the status of Syrian refugees.

On 24 April 2025, the Syria Sanctions Regulations were amended, revoking sanctions on energy, transport, aviation and finance, to help unlock economic reconstruction, and allow UK businesses to reinvest in Syria. Designations of a number of entities (including banks, media companies and government ministries) were also lifted. However, designations remained in place on entities and individuals associated with the Assad regime, to hold them accountable for its actions<sup>37</sup>.

## 10.2 Russia Sanctions Circumvention

Since February 2022, the UK has implemented an extensive system of sanctions and export controls, which restrict Russia's access to the critical goods and technologies required to sustain its military operations and illegal war campaign in Ukraine. Many partner countries have opted to enforce sanctions in their jurisdictions.

Over £20 billion of UK trade with Russia is now sanctioned, and direct trade between the UK and Russia has fallen to historic lows. However, Russia is going to great lengths to circumvent sanctions, and continues to procure Western military, dual-use, and other critical goods through third countries, including beyond battlefield technologies.

Alongside our partners in the European Union, Japan, and the United States, HM Government has developed the Common High Priority List (CHPL)<sup>38</sup>. This list highlights items that pose a heightened risk of illegal diversion to Russia due to their importance to Russia's war efforts. It also aids industry in conducting necessary due diligence. FCD0 engages internationally in regions where – according to publicly available trade data, there is a heightened risk that CHP items and other critical goods will be exported or re-exported to Russia. As a result of this international alignment and diplomatic engagement, overall Russian imports of CHP goods were 17% lower in 2024 compared with 2023.

It remains the responsibility of UK businesses to fully determine the extent of their specific sanctions risk exposure. HM Government published guidance to support exporters and manufacturers to mitigate the risk of their goods becoming targets of circumvention<sup>39</sup>. Where these goods fall under export controls, the risk of sanctions circumvention is assessed under Criterion 7 of the Strategic Export Licensing Criteria. This considers the risk of exports being diverted or re-exported to an undesirable end-user or for an undesirable end-use. To assess this risk, ECJU draws on open-source information, research tools and information from the overseas network.

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37 <https://questions-statements.parliament.uk/written-statements/detail/2025-04-30/hcws612>

38 <https://www.gov.uk/government/publications/russia-sanctions-common-high-priority-items-list/russia-sanctions-common-high-priority-items-list>

39 <https://www.gov.uk/government/publications/countering-russian-sanctions-evasion-and-circumvention/countering-russian-sanctions-evasion-guidance-for-exporters>



# Annex A:

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## The Strategic Export Licensing Criteria

Taken from the Statement to Parliament on 8 December 2021<sup>40</sup>

### 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;

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<sup>40</sup> <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.

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.

### **Assimilated General Export Authorisations (GEAs)**

There are 6 assimilated GEAs under the assimilated 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 assimilated Dual-Use Regulation. There is also one assimilated GEA under the assimilated Torture Regulation. This covers the goods listed in any entry in Annex IV of the assimilated 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 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**

Technical Assistance Licences are issued for separate ad hoc requirements, for example the repair of a single item or simple maintenance tasks, or for 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 control ECJU may combine the technical assistance with goods, software and/or technology under the SIEL application and refuse all aspects together.

Technical assistance licences are also issued relating to military or dual-use items and activities where this is permitted under exemptions to international sanctions and embargoes.

Where an application is for goods and services and a refusal has been recommended under the WMD end-use control<sup>41</sup> ECJU may combine the SIEL application with the Standard Individual Technical Assistance Licence (SITAL) application and refuse them together.

Open Individual Technical Assistance Licences (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.

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



## Sanctions-related Licences

Trade sanctions can include prohibitions on the import, export, transfer, movement, making available or acquisition of goods and technology; the provision or procurement of services related to goods and technology; or the provision or procurement of certain other non-financial services.

ECJU is responsible for licensing the export of goods, software and technology from the UK, including issuing licences for the export of goods and the provision of ancillary services to sanctioned destinations. DBT's Office of Trade Sanctions Implementation (OTSI) was launched in October 2024 to strengthen the UK's implementation and enforcement of trade sanctions. OTSI is responsible for issuing licences for the provision of sanctioned standalone services, including professional and business services.

## 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.<sup>42</sup> In cases where the provision of such services is subject to prior authorisation, a Brokering Services Licences and/or a Financial Services Licence may be granted.

DBT (ECJU) 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, such as luxury goods, G7 dependency and further goods, Russia's vulnerable goods and export-related activities. Licences may be granted for the provision of such services in certain circumstances.

## Licences for multiple services under Russia sanctions regimes

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

## Individual Licences for Export-Related Activities under Russia sanctions regime

The Russia (Sanctions) (EU Exit) Regulations 2019 prohibits a person directly or indirectly making available restricted goods and technology, luxury goods, G7 dependency and further goods, and Russia's vulnerable goods to a person connected with Russia.

## Licences under multiple sanctions regimes

The Russia (Sanctions) (EU Exit) Regulations 2019 prohibits a person directly or indirectly making available restricted goods and technology, luxury goods, G7 dependency and further goods, Russia's vulnerable goods and energy-related goods to a person connected with Russia. The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019, prohibits certain arrangements. Licences may be granted for the activities in certain circumstances.

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<sup>42</sup> <https://www.gov.uk/government/collections/uk-sanctions>

## **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.

## **Professional and Business Services (PBS) Licences**

As a result of further sanctions imposed on Russia since 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. Sanctions related to legal advisory services came into force on 30 June 2023 and were further amended on 6 September 2024.

Throughout 2023, ECJU was the competent authority for licensing the provision of professional and business services that are subject to trade sanctions. In October 2024, OTSI assumed responsibility for issuing these PBS licences, as well as licences for other sanctioned standalone services. OTSI also took over the assessment of 7 applications which had been submitted to ECJU. 3 of these are included in the statistics outlined in this report as they were concluded in 2024.

## **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.

## Syria Humanitarian Licences

DBT (ECJU) 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.

## 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 Criteria in the UK, and against the EU Common Position<sup>43</sup> in other Framework Partner countries.

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<sup>43</sup> Council Common Position 2008/944/CFSP of 9 December 2008 defining common rules governing control of exports of military technology and equipment.

## Annex C:

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# A summary of key changes affecting OGELs in 2024

January – The General Trade Licence: Russia Sanctions – Vessels was revised to include additional scope under the following regulations:

- Regulation 46XB (import of Schedule 3DA revenue generating goods)
- Regulation 46XD (supply and delivery of Schedule 3DA revenue generating goods to a third country)
- Regulation 46XE (technical assistance relating to Schedule 3DA revenue generating goods)
- Regulation 46XF (financial services and funds relating to Schedule 3DA revenue generating goods)
- Regulation 46XG (brokering services relating to Schedule 3DA revenue generating goods)

January – Updates to 13 OGELs to remove some permissible destinations. changes to the Military List (see NTE 2022/26)<sup>44</sup>:

Burkina Faso, Haiti, Mali, and Niger were removed as permissible destinations from the following:

- export after exhibition or demonstration: military goods
- export after repair/replacement after warranty: military goods
- export for repair/replacement under warranty: military goods
- technology for military goods
- transshipment licence
- sporting goods

Haiti was removed as a permitted destination from the following:

- export licence military goods: for demonstration
- access overseas to software and technology for military goods: individual use only
- historic military goods
- maritime anti-piracy

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<sup>44</sup> <https://www.gov.uk/government/publications/notice-to-exporters-202226-export-control-order-2008-amendment>

Burkina Faso, Mali, and Niger was removed as a permitted destination from the following:

- military surplus vehicles
- PCBs and components for military goods
- software and source code for military goods

March – Open general export licence (export of dual-use items to EU member states) was updated to permit the export of certain items controlled under Schedule 3 of the Export Control Order 2008, to certain destinations.

May – Open General Export Licence export for exhibition: military goods, following a change to the Ministry of Defence's (MoD's) contact details.

June – Updates to 4 open general export licences following a change to the Export Control Amendment Regulation that came into force on 1 April 2024. The following OGELs were updated:

- dual-use: export after exhibition
- dual-use: chemicals
- dual-use: export after repair/replacement under warranty
- dual-use: export for repair/replacement under warranty

August – The Global Combat Air Programme Open General Licence was published to support the Global Combat Air Programme

September – The AUKUS Nations Open General Licence was published to support AUKUS and reciprocated the US ITAR exemption.

September – 6 Open General licences were amended following the 2 September 2024 statement<sup>45</sup> on Israel Licence suspensions. The amended licences were: –

- Open general export licence (exports in support of Joint Strike Fighter: F-35 Lightning II)
- Open general export licence PCBs and components for military goods
- Open general export licence technology for military goods
- Open general export licence software and source code for military goods
- Open general trade control licence for category C goods
- Open general trade control licence trade and transportation: small arms and light weapons

October – 2 Open General export licences were amended

- OGEL Exports in Support of Joint Strike Fighter (F-35 Lightning II) updated permitted destinations
- OGEL Exports or transfers in support of UK Government Defence Contracts clarified what eligible contracts were

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<sup>45</sup> <https://www.gov.uk/government/speeches/foreign-secretary-statement-on-uk-policy-on-arms-export-licenses-to-israel>

## Annex D:

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# OGELs and other general licences in force in 2024

**Military and dual-use goods open general licences** these permit the export of certain controlled dual-use goods.

- Exports of non-lethal Military and Dual-use Goods: to UK Diplomatic Missions or Consular posts
- Military and Dual-Use Goods: UK Forces deployed in embargoed destinations
- Military and Dual-Use Goods: UK Forces deployed in non-embargoed destinations
- Global Combat Air Programme (GCAP)
- AUKUS nations

**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
- Information Security Items
- Low Value Shipments
- 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 Assimilated General Export Authorisations are as follows:

- GEA001 – export of most dual-use items to Australia, Canada, Japan, New Zealand, Norway, Switzerland, Liechtenstein, and the United States
- GEA002 – export of certain dual-use items to certain destinations
- GEA003 – export 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 – export of most dual-use items to Australia, Canada, Japan, New Zealand, Norway, Switzerland, Liechtenstein, and the United States
- EU002 – export of certain dual-use items to certain destinations
- EU003 – export 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