UK Government

United Kingdom Strategic Export Controls Annual Report 2025

HC 557

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Foreword

This Annual Report sets out the United Kingdom's strategic export controls activity in 2025. Strategic exports are an important part of the UK economy, supporting jobs and industries at home - as well as supporting our national security and foreign policy overseas. But it is vital that those exports do not fall into the wrong hands - and can never be used to commit acts which violate basic human rights, or which breach international humanitarian law. That is what the UK's system of export controls seeks to do, and this report gives important transparency to Parliament on how it operates.

The report reflects a year in which the export control system operated in a particularly demanding international and operational environment. Rightly there is strong parliamentary and public interest in ensuring there are strong export controls connected to Gaza - including for example the suspension we put in place in September 2024 to stop all exports to the IDF (Israel Defense Forces) which might be used in a breach of international humanitarian law. In relation to Russia and Ukraine, the report shows how sanctions, heightened diversion risks and the need to support Ukraine's defence have continued to shape licensing activity and place new demands on operational and policy teams. In both contexts, the report underlines the need for the export control system to remain agile, evidence-based and capable of responding quickly to changing circumstances while maintaining rigorous scrutiny.

The report demonstrates how the control regime continues to adapt to evolving risks and points to the increasing prominence of emerging and dual-use technologies in the export control landscape. As technological change accelerates, HM Government must ensure that the UK's strategic export controls remain effective, proportionate and responsive. The reviews and policy work described in this report, including work on emerging technologies, are therefore an important part of ensuring that the UK's strategic export controls remain effective, proportionate and fit for purpose in a changing global environment.

The report also sets out candidly the pressures on operational performance during 2025. Although performance against published targets remained below the standard we ideally seek to attain for the year as a whole, the report shows the practical action being taken to improve timeliness, strengthen case handling and build a resilient service, all of which resulted in improved operational performance in the latter half of 2025.

A central theme of this year's report is the transition from SPIRE to LITE, the new digital licensing platform. This is a major modernisation programme, designed to replace legacy infrastructure, improve security and accessibility, and support a more efficient and user-centred licensing service over time. This transition has brought short-term operational challenges, but it also represents an important investment in the future capability, resilience and transparency of the export control system and has been actively supported by industry.

Strategic export controls are an essential part of responsible government: they protect our security, support our international partnerships, and help ensure that UK exports are consistent with our values and obligations. This report provides Parliament and the public with a clear account of how those responsibilities were discharged in 2025, and of the steps being taken to strengthen the system for the years ahead.

The Rt Hon Peter Kyle MP
Secretary of State for Business & Trade and President of the Board of Trade

The Rt Hon Yvette Cooper MP
Secretary of State for Foreign, Commonwealth & Development Affairs

The Rt Hon Dan Jarvis MP
Secretary of State for Defence

Section 1:

Export licensing process and basics

1.1 The need for export licensing

Export controls protect global security by restricting who has access to sensitive technologies and capabilities, ensuring UK exports do not contribute to Weapon of Mass Destruction (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 International Humanitarian Law. They are a means by which a range of international obligations and commitments, including the Arms Trade Treaty (ATT), 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 legislation and current EU legislation are also relevant.

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

Under the terms of the Windsor Framework[2], 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 2025.

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[3]

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[4]
- The Australia Group[5]
- The Wassenaar Arrangement[6]
- The Zangger Committee[7]

- 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), although a new regulation (EU) 2025/41 is in force, it does not apply to exports of firearms until 12 February 2029
- 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 (Article 4 of Regulation (EU) 2021/ 821 for Northern Ireland), 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. Articles 6, 10, 11 and 12 of the Export Control Order 2008 extend the scope of the WMD controls to include: where a person suspects that dual-use goods, software or technology are or may be intended for a WMD purpose; transfers of software or technology for a WMD purpose within the UK; transfers of software or technology for a WMD purpose by a UK person from outside the UK; and transfers of software or technology for a WMD purpose by non-electronic means to destination outside the UK.

Article 12a of the Export Control Order 2008 enhances the Military End-Use Control (MEUC), by extending the scope of this control to use by a broader range of relevant entities.

1.2 The Export Control Joint Unit (ECJU)

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.

Departments involved in export control

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

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 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

Advisory departments

The principal advisory departments are the FCDO and 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 Strategic Export Licensing 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 International Humanitarian Law
- 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 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 credible media reporting.

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 operates the MOD Form 680 (F680) approval process which enables HM Government to control the release of classified equipment or information to foreign entities without compromising the UK's national security. The MOD is responsible for processing gifting applications on behalf of HMG (further details can be found in section 6).

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)

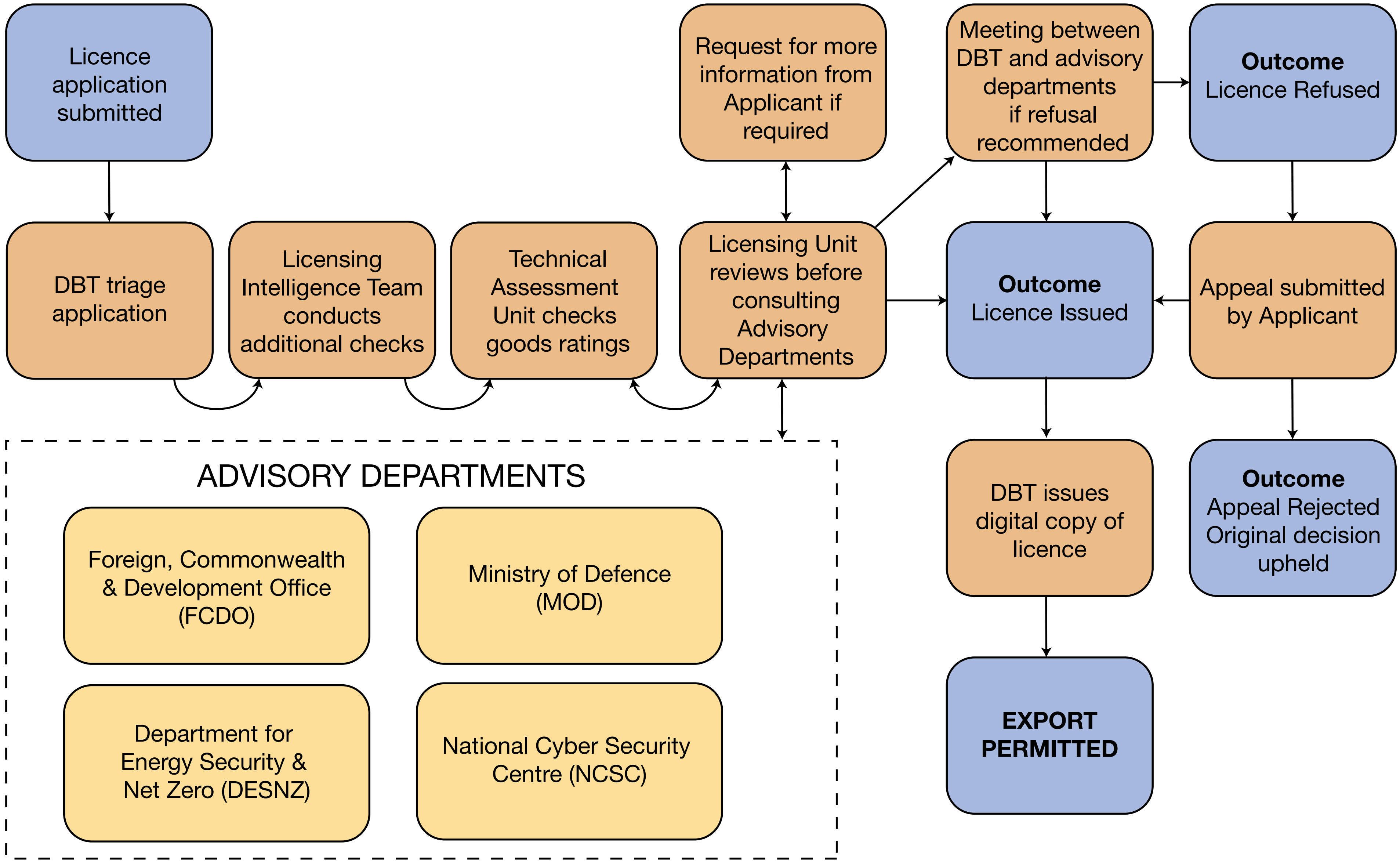
DESNZ plays a key role in HM Government's chemical and nuclear non-proliferation policy. DESNZ ensures HM Government continues to meet its obligations under the Chemical Weapons Convention (CWC) and Nuclear Suppliers Group (NSG). For the CWC, DESNZ ensures CWC Schedule 1 chemical exports are appropriately 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 transhipment 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 (Licensing for International Trade and Export), 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.

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

Table 1.1 Summary of applications and registrations

Licence type	Applications and registrations received in 2025
Standard Individual Export Licences (SIELs)	14,849[8]
Open Individual Export Licences (OIELs)	444[9]
Open General Export Licences (OGELs)*	1,192
Assimilated General Export Authorisations (GEAs)*	270
Union General Export Authorisations (GEAs)*	43
Standard Individual Trade Control Licences (SITCLs)	229
Open Individual Trade Control Licences (OITCLs)	49
Open General Trade Control Licences (OGTCLs)*	48
Standard Individual Transhipment Licences (SITLs)	5
Open General Transhipment Licences (OGTLs)*	6
General Trade Licences*	29
Other types of General licences*	1

*Registrations are based on finalised records available on gov.uk

8 1,496 SIEL applications were made on the SPIRE legacy system and 13,353 on the replacement export licensing system, LITE – based on records held as at 5 January 2026.

9 428 OIEL applications were made on the SPIRE legacy system and 16 on the replacement export licensing system, LITE – based on records held as at 5 January 2026.

Section 2:

Export licensing data

2.1 Transparency

Transparency is one of the key priorities for the ECJU, with the unit looking to publish what it can, whilst being mindful of the very real commercial sensitivities of the data entrusted to us by UK exporters.

HM Government publishes quarterly strategic export controls licensing decisions statistics[10] 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)[11] 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. Given the exceptional circumstances, and the significant Parliamentary and public interest in the conflict in Gaza, HM Government has also published a series of ad hoc management information releases since May 2024 to provide more current information about Israel export licensing.

Completeness of published data

The official statistics have progressively expanded their coverage of licensing decisions processed through LITE. A significant milestone was reached with the publication of Q2 2025 data in November 2025, when, for the first time, the statistics incorporated the full set of licensing decisions across both SPIRE and LITE systems.

Data Quality

Between Q1 2023 and Q1 2025, published statistics were affected by limitations in extracting complete and accurate data from LITE, which have been clearly caveated alongside the impacted figures in the licensing decision statistics.[12]

10 https://www.gov.uk/government/collections/strategic-export-controls-licensing-data#quarterly-reports
11 https://www.exportcontroldb.businessandtrade.gov.uk/sdb2/fox/sdb/SDBHOME
12 https://www.gov.uk/government/publications/strategic-export-control-statistics-statement-of-administrative-sources/export-licensing-statistics-statement-of-administrative-sources

In December 2024, ECJU Official Statistics were reclassified as 'Official Statistics in Development' due to changes affecting data quality. This status has continued through 2025 and will remain until there is full confidence in new data extraction processes and data quality.

Timeliness of the ECJU quarterly statistics

To generate the quarterly statistics, data is extracted across SPIRE and LITE, which is then merged and quality assured, before final publication data tables are produced. The timeliness of publishing ECJU licensing outcomes was significantly affected during 2024 and 2025 due to the added complexity of operating both LITE and SPIRE systems in parallel. Additional time was required to extract and prepare data of varying quality across the two platforms.

Over the course of 2025, the timeliness of publications improved, with the lag between the reporting period and publication reduced to around 4.5 months. Work is ongoing to further enhance timeliness, with the aim of returning to a publication timeline of approximately 3.5 to 4 months after the reporting period, in line with performance prior to the introduction of LITE as soon as reasonably possible.

Ad hoc Management Information publications

Given the exceptional circumstances, and the significant Parliamentary and public interest in the conflict in Gaza, DBT has published a series of ad hoc management information releases[13] since May 2024, to provide more current information about Israel export licensing. These ad hoc management information releases have provided data at the date of each update on Israel export licence applications in progress, Israel export licences that remained extant and Israel export licensing decisions made between 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. One such release was published in 2025 (on 28 August), covering the period 7 December 2024 to 31 July 2025. The remainder of relevant licensing decisions in 2025 were covered in the 20 April 2026 release, which covered the period 1 August 2025 to 28 February 2026.

Information on actual licence usage

It has been a long-held ambition of ECJU to collate, utilise and make public information on actual licence usage data. Whilst some such data is transmitted to DBT systems, this has not historically been done in a manner that makes aggregated data accessible, suitable for publication. ECJU is therefore actively exploring with HMRC a new system to rectify these issues, with a view to being able to provide more information on the usage of export licences. Progress is being made, although more work remains to be done on data assurance, completeness, and the level of detail that could eventually be published.

2.2 Data for each licence type

The following tables and charts provide details of the outcomes on each of the main types of licence during 2025. Any data referred to as "Issued", "Refused", "Rejected" or "Revoked" is taken from the quarterly statistics available on GOV.UK.

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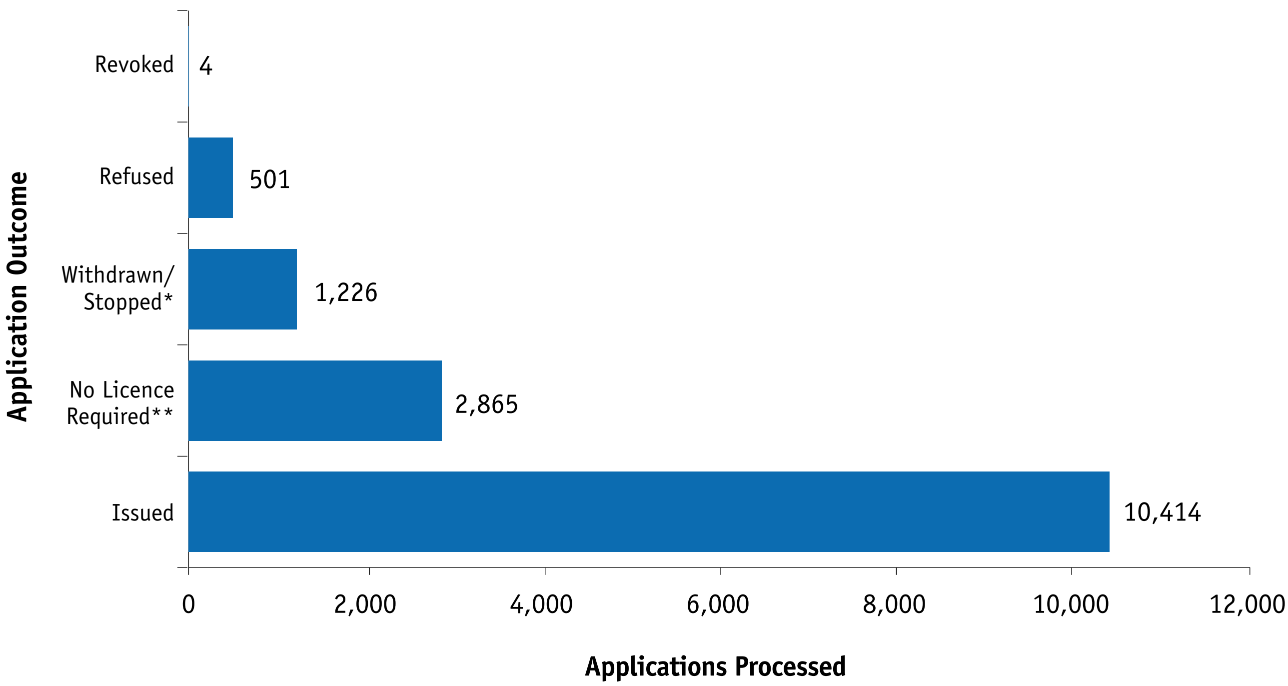
13 https://www.gov.uk/government/publications/export-control-licensing-management-information-for-israel

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 27 April 2026, unless an alternative date is stated.

Table 2.1 Summary of application outcomes in 2025[14]

Outcome	SIELs	SITLs	OIELs	SITCLs	OITCLs
Issued	10,414	2	247	121	11
Refused / Rejected	501	0	44	7	4
No Licence Required	2,865	0	4	23	1
Withdrawn, Stopped or Unsuitable	1,226	4	101	67	29
Revoked[15]	4	0	0	0	0
Total licensing decisions	15,010	6	396	218	45

Chart 2.1 Application outcome of Standard Individual Export Licences (SIELs) in 2025



* 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:

14 Applications processed to completion in 2025 will have predominantly been originally received during 2025, but a minority of applications will have been received in previous years. Please note due to rounding, totals may not sum to their individual parts.

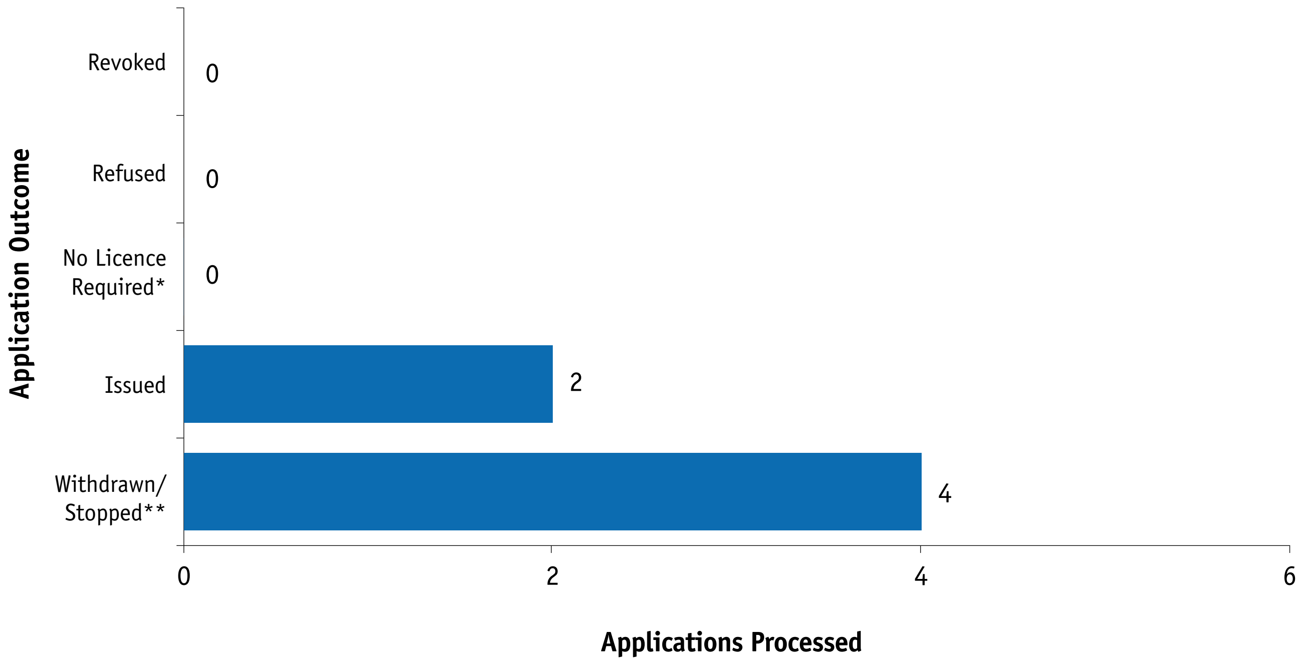
15 Unlike other outcomes that happen during the application process, revocations are previously issued licences that have since been revoked.

- 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 SIELs granted does not indicate the actual value of exports shipped during the reporting period, but is 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.

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 Application outcome of Standard Individual Transhipment Licences (SITLs) in 2025

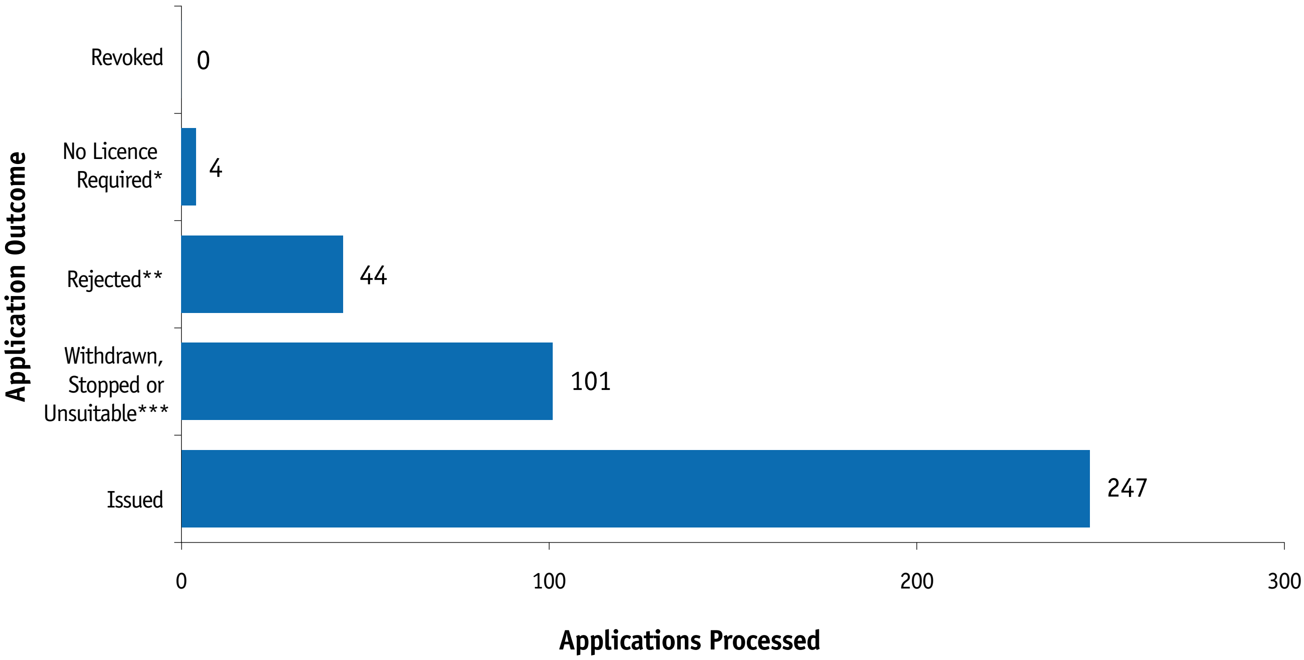


* Some applications are submitted for goods that do not require an export licence. Where this is determined, the applicant is informed that no licence is required.

** 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 – transhipments". 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 Application outcome for Open Individual Export Licences (OIELs) in 2025



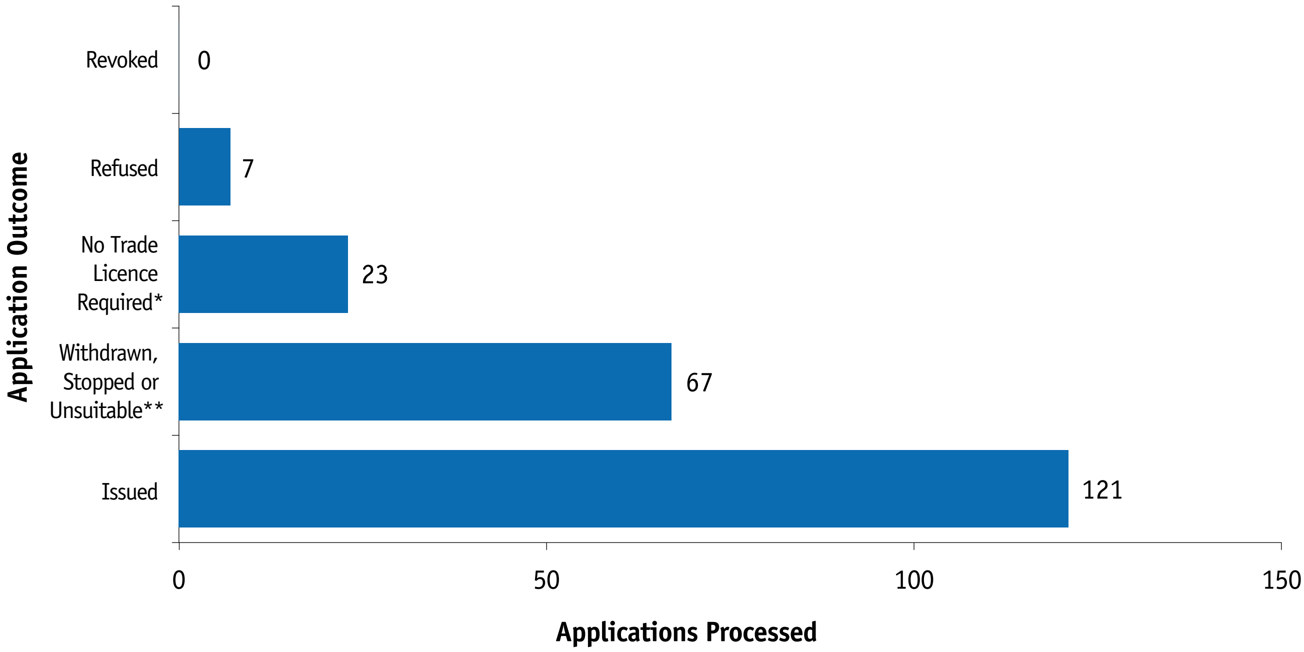
* Some applications are submitted for goods that do not require an export licence. Where this is determined, the applicant is informed that no licence is required.

** Some applications are not suitable for OIELs and may need the scrutiny that a SIEL application provides, to fully 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 Application outcome of Standard Individual Trade Control Licences (SITCLs) in 2025

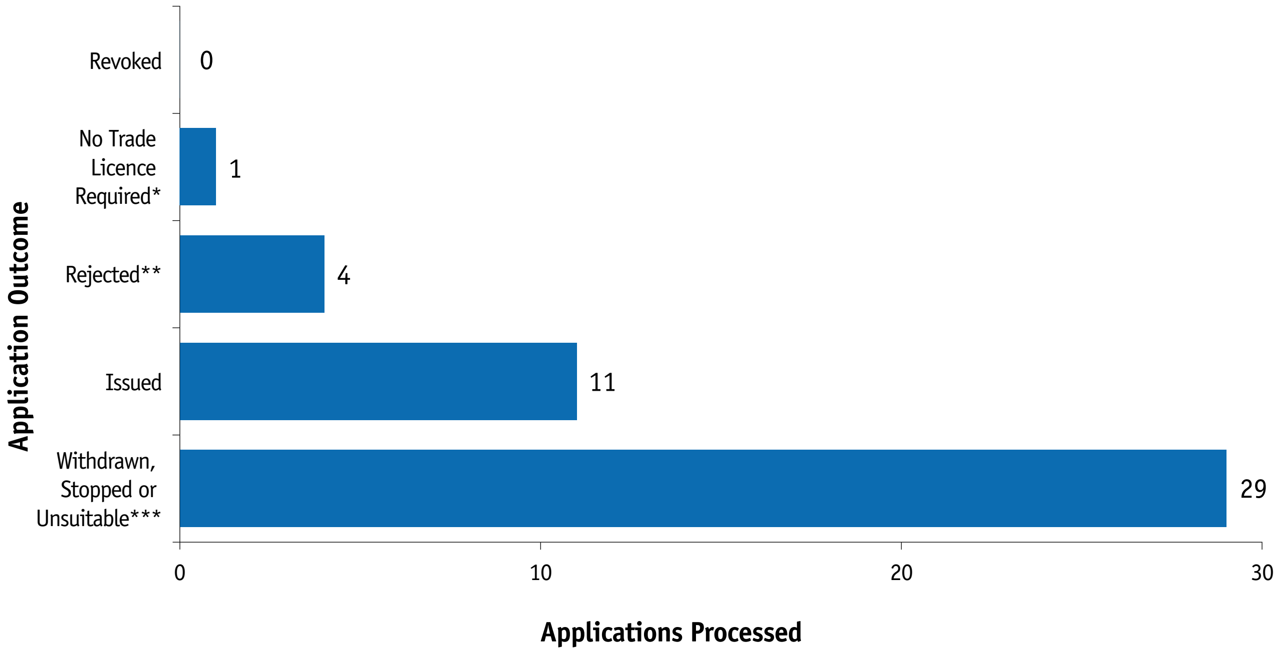


* Some applications are submitted for goods that do not require a trade control licence. Where this is determined, the applicant is informed that no licence is required.

** 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 Application outcome for Open Individual Trade Control Licences (OITCLs) in 2025



* 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 SITCL provides, to fully 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 the goods.

2.3 Performance against targets

On receipt of a Standard Individual Export Licence (SIEL) application, ECJU's target is to complete 70% of cases within 20 working days (primary target) and 99% within 60 working days (secondary target). Performance against these targets during 2025 remained challenging, with neither the primary nor secondary target met. Recent performance against the secondary target reflects the longstanding difficulty ECJU has faced in achieving this target. It has only been met twice since it was introduced in 2013 – in 2014 and 2016.

The methodology used to calculate the initial processing time differs between SPIRE and LITE. Comparisons between LITE and SPIRE processing statistics should take these differences into account.[16]

Table 2.2 SPIRE SIEL processing performance (Annual)

SPIRE Outcomes	2025	2024	2023
Number of applications completed in 20 working days	1,002	6,539	7,746
% of applications completed in 20 working days	51	60	52
Number of applications completed in 60 working days	1,403	9,179	13,049
% of applications completed in 60 working days	72	84	87
Median processing time in days	20	16	20

Table 2.3 LITE SIEL processing performance (Annual)

LITE Outcomes	2025	2024	2023
Number of applications completed in 20 working days	6,968	2,127	489
% of applications completed in 20 working days	53	47	38
Number of applications completed in 60 working days	11,867	4,172	1,174
% of applications completed in 60 working days	91	93	92
Median processing time in days	19	22	25

16 For cases processed through SPIRE, the processing time is calculated by counting the number of working days between an application's submission and closure, excluding any days the application was returned to the exporter with a "Request for Information" (RFI). Working days do not include Saturdays, Sundays, or public holidays. For cases processed through LITE, the processing time is calculated by counting the number of working days between an application's most recent application amendment, (or date of original submission if no application amendments have been made) and closure, excluding any days the application was "Returned for Information" (RFI). Working days do not include Saturdays, Sundays, or public holidays.

Chart 2.6 SIEL application performance against the primary 20 working-day target (Quarterly)

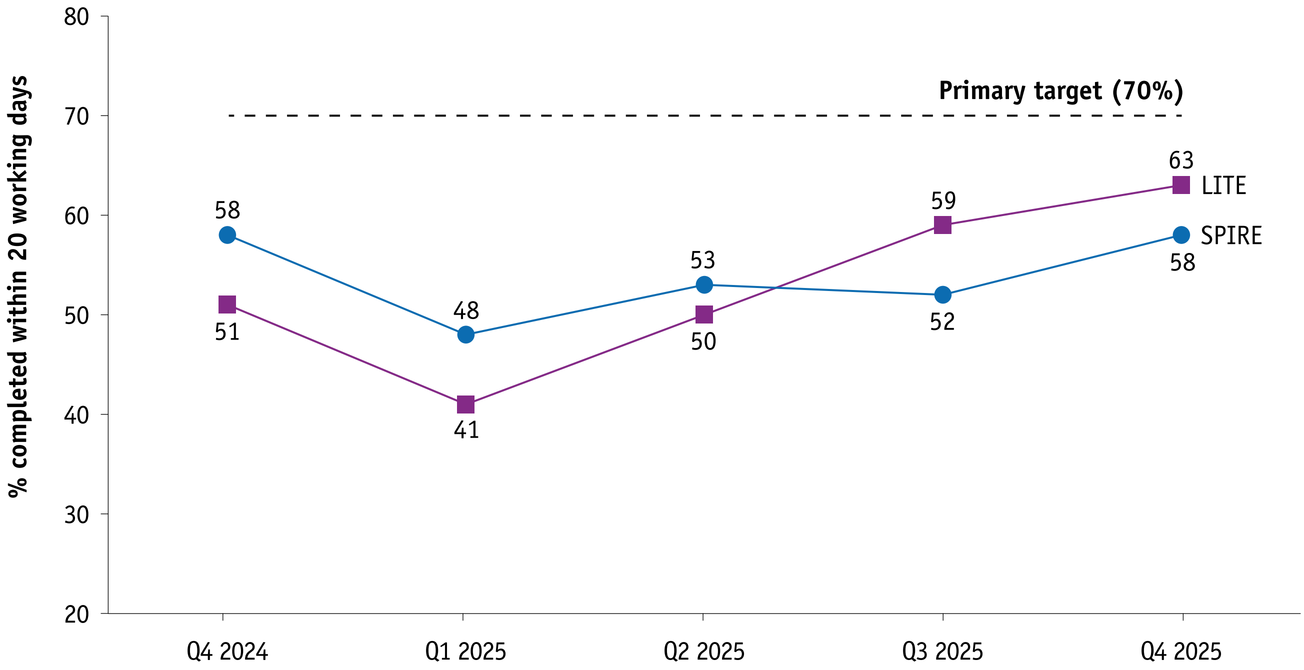
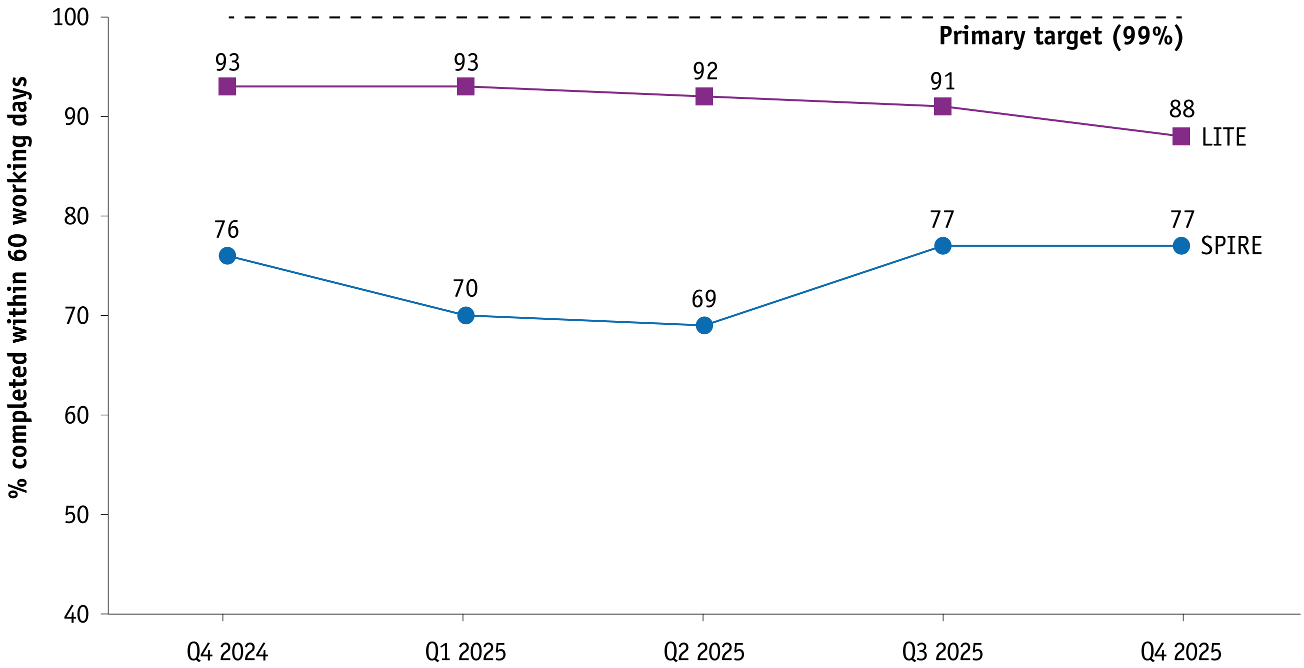


Chart 2.7 SIEL application performance against the secondary 60 working-day target (Quarterly)



Performance has been affected less by the number of applications, which has stayed fairly steady, and more by an increase in complex cases. In 2025, global events added pressure, including Russia-related sanctions, support for Ukraine, conflict in the Middle East, and closer checks on exports of emerging and dual-use technologies. These factors meant more applications needed detailed review and cross-government input, which has increased processing times.

In addition, ECJU's performance in 2025, especially in the first quarter of the year, has been substantially affected by a rapid increase in applications on LITE. LITE entering 'public beta' in September 2024 was a significant milestone in a longstanding and complex project. Ultimately, LITE will modernise export licensing; reduce reliance on outdated third-party systems; improve security and accessibility; and align with modern GOV.UK service standards.

This tipping point of transition of SIELs at scale to the new system made 2025 a challenging operational year. In 2025, 87% of SIELs were processed through LITE, while the remaining 13% used SPIRE. There was a notable reduction in performance against the 20-working-day target in the early part of 2025, as exporters and ECJU operational teams adapted to using a new system. As with the transition to any new digital system, new issues became apparent when operating at scale in a live environment, rather than in a development phase and were subsequently remedied.

Performance against the 60-working-day target followed different patterns across the two systems: SPIRE performance initially fell, as most routine applications were now being submitted via LITE; while LITE performance remained high, but declined gradually. Whilst performance returned towards levels nearer our public targets in the latter part of 2025, this was too late to affect the overall annual average performance figures.

Operating the licensing service across two different systems concurrently, whilst also iteratively developing LITE was also labour intensive for operations teams who need to inform developers' work alongside their "day job" of processing licences. ECJU is committed to delivering LITE and managing this transitional phase in a way that maintains operational performance. We are concentrating on critical improvements to the SIELs service in LITE to ensure we address the issues having the greatest effect on performance.

More generally, we are making concerted efforts to improve our performance by taking a more proactive, targeted approach to prioritising our caseload using daily and weekly feeds of Management Information to better address blockages or backlogs in different parts of the case pipeline and prioritise resources effectively. We have also introduced a more efficient process for refused applications which speeds up refusals for simpler cases. New processes to 'batch assess' certain similar complex applications have been introduced, as well as a pilot in one of our advisory teams for an automated tool to triage cases efficiently. Taken together, we are confident these are the right steps to improve on our performance for next year. We are identifying additional ways to continuously improve the efficiency of the licensing service, as well as the guidance we provide to exporters on some of our more complex licensing rules such as the Military End-Use Control (MEUC).

2.4 Refusals

There were 508 Standard Individual Licences (SIELs, SITLs or SITCLs) refused in 2025, compared with 611 in 2024. Table 2.4 contains the number of refusals per Criteria.

The refusal[17] rate for these licences has decreased from 4.6% of finalised applications in 2024 to 3.6% in 2025. 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.

17 The refusal rate calculates all applications finalised as issued, refused or with a No Licence Required (NLR) outcome.

Table 2.4* Reasons for refusals of SIEL and SITCL applications

Reason for refusal	2025	2024	2023
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	5	6
Criterion 1 – UK's commitments and obligations to observe UN, OSCE and UK arms embargoes	74	53	39
Criterion 1 – Announced national measures or restrictions	5	10	8
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	35	39	22
Criterion 3 – Preservation of internal peace and security	1	3	1
Criterion 4 – Preservation of peace and security	45	6	3
Criterion 5 – National security of the UK, as well as that of friendly and allied countries	113	180	175
Criterion 6 – Behaviour of the buyer country with regard to the international community	1	0	0
Criterion 7 – Risk of diversion to an undesirable end-user or for an undesirable end-use	437	486	321
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	34	33	77
***Catch-all controls for non-listed items – Military End-Use	194	296	447

* 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 effect of the changes, cases where the MEUC 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 2.4 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 licences that have been granted but are subsequently 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 four revocations of SIELs and SITCLs in 2025.

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. There were no suspensions of SIELs and SITCLs in 2025. Two open individual licences to Israel were suspended in 2025, and more detail on ongoing licensing to this destination is provided in ad hoc data releases on GOV.UK. with additional context in section 7.2.[18]

Table 2.5 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 2.5* Reasons for revocations of SIEL and SITCL licences

Reason for revocation	2025	2024	2023
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	0	1
Criterion 1 – UK's commitments and obligations to observe UN, OSCE and UK arms embargoes	0	0	1
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	0	1
Criterion 3 – Preservation of internal peace and security	0	0	0
Criterion 4 – Preservation of peace and security	4	0	1
Criterion 5 – National security of the UK, as well as that of friendly and allied countries	0	0	1

18 https://www.gov.uk/government/publications/export-control-licensing-management-information-for-israel

Reason for revocation	2025	2024	2023
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	0	2
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 effect of the changes, cases where the MEUC 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 2.6* Appeals outcome and performance

Outcomes	2025	2024	2023
Number of Appeals received**	91	50	95
Number of Appeals finalised	91	72	50
Median processing time for finalised Appeals (days)	36	106	80
Number of Appeals where refusal was upheld	87	68	46
Number of Appeals where refusal was overturned	4	5	4

* Data is based on management information records as of 9 April 2026.

** 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 or SITCL (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 decrease in the number of appeals received in 2024, there was a sharp increase in the number of new appeals received in 2025. In turn, there was an increase in the number of appeals finalised. However, this did not have an effect on timeliness and ECJU performance figures. The median processing time for appeals decreased from 106 days in 2024 to 36 days in 2025. The improvement was due to more team members working on appeals and the fact that most cases are now processed on LITE, and appeals are introduced directly into LITE by the exporters, making the appeals process more efficient.

2.7 Data on other types of licence

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

Table 2.7 Other licence type decisions made in 2025

Licence application type	Licence sub-type	Issued	Refused	Revoked
Technical Assistance Licences	WMD (Weapons of Mass Destruction)	0	0	0
Technical Assistance Licences	Sanctions	0	0	0
Technical Assistance Licences	Energy related items under the Russia Sanctions	0	0	0
Technical Assistance Licences	Russia Sanctions - Other	4	0	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.	53	0	0
Individual Brokering Services Licences	Restricted goods and technology	1	0	0
Licences for multiple services - Financial Services and Brokering Services	N/A	1	0	0
Individual Licences for export-related activities	Restricted goods and technology, luxury goods, G7 dependency and further goods, and Russia’s vulnerable goods	3	0	0
Syrian Humanitarian Licences	N/A	0	0	0

Licence application type	Licence sub-type	Issued	Refused	Revoked
Licence under multiple sanctions regimes	Restricted goods and technology, luxury goods, G7 dependency and further goods, Russia's vulnerable goods and energy related goods.	0	0	0
Professional and Business Services Licences	N/A	10	1	0
Licences for drugs used in execution by lethal injection	N/A	0	0	0
Global Project Licences	N/A	0	0	0

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[19] 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 2025, there were 72 OGELs and general licences in force, one of which was revoked and one extended. 21 OGELs were amended in 2025, 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 2025 is set out in Annex C. A list of OGELs and other general licences in force in 2025 is set out in Annex D.

19 https://www.gov.uk/government/collections/open-general-export-licences-ogels

Section 3:

Modernising ECJU

3.1 Improving the way ECJU works

In 2025, the ECJU established a continuous improvement programme aimed at enhancing service delivery to UK exporters by identifying opportunities to improve operational performance and quality. A dedicated continuous improvement team was recruited, tasked with conducting systematic reviews of existing processes and identifying ways to make these more efficient, with service to exporters in mind.

A commitment to continuous improvement has been embedded across all operational areas, with regular monitoring and evaluation mechanisms established to track progress and identify further opportunities for refinement.

A significant milestone in this improvement journey has been the comprehensive review of operational processes undertaken in parallel with the design and development of LITE. As part of this modernisation programme, ECJU is introducing new standardised operating procedures across all teams responsible for processing SIELs. These procedures have been designed to ensure consistency in decision-making across different case officers and government departments, maintain consistency of information throughout the licensing process, and establish clear quality assurance frameworks. Throughout 2026, further development of standard operating procedures will cover the Open Individual Export Licence (OIELs) process as well as processes for other licence types.

In 2025 ECJU has also concentrated on improving support and guidance to exporters. The ECJU helpdesk introduced new technology that allowed more efficient management of queries, providing a better service to those requiring support. Increased communications have taken place, through targeted webinars when new technology was released as well as a review of the content available to exporters via the internet.

A key objective for 2026 is to complete a review of the published communications and content to make it easier for exporters and users of the service to find out information about export controls.

3.2 Modernising the new online digital system for export licensing

Development of the new online digital service for export licensing, LITE, made significant progress during 2025 as ECJU continued to transition away from the legacy SPIRE platform. LITE provides exporters with a modern GOV.UK compliant route for submitting applications and is a central component of ECJU's digital modernisation programme.

Following its move from small, invitation-only test environment to a wider trial run in September 2024, LITE saw strong adoption throughout 2025. By the end of 2025, the majority of export licence applications were processed through LITE, with 87% of SIEL applications submitted via the system. In 2025, the service also expanded beyond SIELs with the introduction of the F680 application route on LITE. The rollout of F680s marked an important step in reducing reliance on SPIRE, and work continues into 2026 to increase the proportion of F680 applications handled through the online system.

The LITE programme maintained strong engagement with exporters and internal users throughout the year, including targeted user research, online events, and close collaboration with licensing officers across government. Exporters continue to be supported by a dedicated helpdesk, with service enhancements informed by ongoing feedback.

Monitoring and evaluation of the LITE programme is in place. The initial survey and interviews with SPIRE users have been completed, with further research concentrated on LITE now in progress. We intend to publish the full evaluation findings in due course once the research is complete.

Looking ahead to 2026, ECJU will continue to develop additional licence types and further improve existing services on LITE. This work will be phased and prioritised around high volume and operationally critical needs, supporting the wider programme to modernise ECJU's digital and operational capabilities while ensuring continuity of service as migration from SPIRE continues. Further development is planned in 2026 to enable LITE to produce new management information data, which is critical to supporting ECJU to make operational improvements and reduce processing times.

Section 4:

Updates on legislation

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

As set out in section 1.1 there are various aspects to the legal framework for the UK's export controls, including the Export Control Act 2002, the Export Control Order 2008 and a variety of assimilated and current EU legislation. The following amendments were made to relevant legislation in 2025:

Table 4.1 Amendments to export control legislation in 2025

Title	Reference	Description
The Export Control (Amendment) Regulations 2025	2025 No. 532	These Regulations amend the Export Control Order 2008 and assimilated 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).

Title	Reference	Description
The Export Control (Amendment) (No. 2) Regulations 2025	2025 No. 1197	These Regulations amend the Export Control Order 2008, assimilated 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), and assimilated Regulation (EU) 2019/125 of the European Parliament and of the Council of 16 January 2019 concerning trade in certain goods which could be used for capital punishment, torture or other cruel, inhuman or degrading treatment or punishment (codification).
Commission Delegated Regulation (EU) 2025/2003 of 8 September 2025 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) 2025/2003	Updates Annex I of Regulation (EU) 2021/821 for dual-use items subject to control when they are exported from or in transit through Northern Ireland.
Regulation (EU) 2025/41 of the European Parliament and of the Council of 19 December 2024 on import, export and transit measures for firearms, essential components and ammunition, implementing Article 10 of the United Nations Protocol against the illicit manufacturing of and trafficking in firearms, their parts and components and ammunition, supplementing the United Nations Convention against Transnational Organised Crime (UN Firearms Protocol) (recast)	Regulation (EU) 2025/41	Recasts the previous Firearms regulation (EU) No 258/2012, for import, export, and transit measures for firearms. Does not come into force for the export of firearms essential components and ammunition until 12 February 2029.
Commission Delegated Regulation (EU) 2025/928 of 21 May 2025 amending Regulation (EU) 2019/125 of the European Parliament and of the Council concerning trade in certain goods which could be used for capital punishment, torture or other cruel, inhuman, or degrading treatment or punishment	Commission Delegated Regulation (EU) 2025/928	Updates Annex II and Annex III of Regulation (EU) 2019/125 for trade in goods from Northern Ireland which could be used for capital punishment, torture or other cruel, inhuman, or degrading treatment or punishment.

Section 5:

External engagement

5.1 Parliamentary engagement

Parliamentary oversight of export controls was provided through Business and Trade Committee (BTC), and the Business and Trade Sub-Committee on Economic Security, Arms and Export Controls.

In March 2025, ECJU hosted members from the BTC at the Department for Business and Trade offices for an in-person briefing on export control and sanctions policy developments and the ongoing delivery of the LITE system.

In July 2025, the Minister of State for Trade Policy and Economic Security, Rt Hon Douglas Alexander MP, and the Chancellor of the Duchy of Lancaster, Rt Hon Pat McFadden MP, gave oral evidence to the BTC Sub-Committee on Economic Security, Arms and Export Controls on UK Economic Security. They were accompanied by the DBT's Director of Geopolitics and Economic Security Philippa Makepeace and the Deputy National Security Advisor (Economics) Jonathan Black.

In September 2025, the Minister of State for Trade Policy, Sir Chris Bryant MP, the Minister of State for Defence Readiness and Industry, Luke Pollard MP, and the Minister of State for the Middle East, North Africa, Afghanistan and Pakistan, Hamish Falconer MP gave oral evidence to the BTC on UK arms exports to Israel. They were accompanied by DBT's Director of Export Controls and Sanctions Dr Rosemary Pratt, the MOD's Director – Fixed Wing, Defence, Equipment and Support Keith Bethell CBE, and the FCDO's Head of the International Humanitarian Law Cell, Ciaran Morrisey.

Since then, ECJU has continued to engage with the Committee by providing detailed responses to queries regarding arms export controls. Such engagements have helped ECJU to ensure its processes are robust, and to prioritise improvements, particularly in data and transparency, to ensure adequate scrutiny can take place.

5.2 Raising awareness of export licensing with industry and academia

During 2025, 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.

Notices to Exporters in 2025

During 2025, the ECJU published 34 Notices to Exporters providing updates and guidance to exporters on changes to export control legislation, licensing procedures, sanctions implementation, and compliance expectations. The subjects of these notices included:

- **Legislative and Regulatory Updates**, for example advance notice and implementation guidance for changes to the Export Control Order 2008 and the assimilated Dual Use Regulation agreed through multilateral export control regimes, as well as the UK's policy priorities in relation to emerging technologies and national security. Notices also informed exporters of amendments to the UK Strategic Export Control Lists, ensuring alignment with the Wassenaar Arrangement, Australia Group, Missile Technology Control Regime and Nuclear Suppliers Group. Exporters were encouraged to review classification decisions and licensing requirements in light of these updates
- **Open General Export Licences (OGELs) and General Trade Licences,** including changes to permitted destinations, amendments to licence conditions, and updates to reflect evolving geopolitical and security considerations. Notable updates included changes linked to defence cooperation arrangements, such as AUKUS, and the revision of licences relating to specific military and dual use exports
- **Sanctions and Russia Related Measures,** a substantial focus of the 2025 Notices related to the implementation and enforcement of sanctions against Russia including guidance on countering sanctions circumvention and evasion, including the use of strengthened contractual "no re export" clauses and reference to the Common High-Priority List of goods identified as critical to Russian military capabilities. Exporters were reminded of their obligations to conduct robust due diligence and to remain alert to indirect supply routes and diversion risks
- **Compliance, Enforcement and Compound Settlements,** highlighting enforcement outcomes and compliance expectations, including publication of compound settlements agreed with UK exporters for breaches of export control and sanctions legislation, some involving significant financial penalties (underlining the importance of effective internal compliance programmes, accurate licensing, and timely voluntary disclosures where breaches occur)
- **Country Specific and Policy Changes,** communicate country specific export control changes, including the removal of the UK arms embargo on Armenia and Azerbaijan and updates reflecting the UK's accession to international defence export control agreements

Events

ECJU participated in several trade, academia, defence and security events. These are opportunities to strengthen relationships with industry partners, support export control awareness, facilitate discussion on compliance best practice and ensure events comply with UK and international laws. These included:

- the Security and Policing 2026 event, provided by the Home Office, DBT, Joint Security and Resilience Centre (JSaRC), and ADS Group Limited (ADS), which offers industry stakeholders a place to discuss sales, current challenges and opportunities with the government
- DSEI 2025 (Defence & Security Equipment International), the flagship defence event for the UK where ECJU provides cross team support for defence exporters
- the Higher Education Export Control Association (HEECA) annual conference, at which ECJU provided talks and training to the academic sector

- the SAE Media Group's 'Defence Exports Conference' where delegates hear from government speakers and senior international trade compliance professionals from around the world
- the 2025 Defence Procurement Research Technology and Exportability (DPRTE) event where ECJU and UK DSE advise UK defence exporters
- the UK Defence and Security Exports (UK DSE) Small to Medium Enterprises (SME) surgeries for companies new to exporting

On 15 October 2025, ECJU also hosted its annual Export Controls and Sanctions Symposium in London including workshops provided by HMRC, FCDO, and MOD. The ADS trade association provided International Traffic in Arms Regulations (ITAR) training, and other industry and academia associations provided one to one support to exporters. This event attracted over 300 participants and provided updates on the UK's export control priorities, the LITE programme and current export control challenges around the world.

Online

The recorded webinars on GOV.UK have been viewed over 25,000 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.

Helplines

In 2025 the Export Control Helpline received over 2,600 calls and 27,500 emails. The helpline provides support to exporters on many aspects, including export controls, ongoing applications, open licences, customs declarations and support with SPIRE and LITE licence applications. The LITE platform support service received over 12,600 enquiries in 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

Representatives from ECJU and its advisory departments engaged in various in-person international outreach activities.

In February, ECJU attended the 31st Asian Export Control Seminar in Tokyo to provide updates on export control and sanctions measures. There was a discussion on the challenges arising from recent technological developments and changes in the international landscape, and gave a presentation on UK licensing systems, policies and procedures.

In May, senior officials from ECJU visited Beijing to take part in the Export Control Working Group, for discussions with their counterparts from China's Ministry of Commerce (MOFCOM). The discussions enhanced understanding of processes and key priorities in respective export controls systems, including engagement on issues of specific concern to UK exporters.

In June, ECJU officials took part in a bilateral working group with Indian government officials on export controls, which covered issues of interests to both sides, including the key priorities within our respective export control systems and the facilitation of dual-use and military exports of priority to both countries.

In November, ECJU participated in the annual meeting of the 'Letters of Intent' group, a meeting of the agencies responsible for the export licensing for military goods from Germany, France, Italy, Sweden and Spain. This supported our increasing cooperation with key European partners on defence exports – further enhanced by the UK's accession to the Agreement on Defence Export Controls with Spain, France and Germany in December 2025.

Also in December, DBT's Director for Export Controls and Sanctions, Dr Rosemary Pratt, participated in a panel discussion at the EU Export Control Forum in Brussels on lessons learnt from the Russia sanctions on the challenges of circumvention. This built on regular engagement between ECJU, the Commission and EU Member States on export controls over the course of 2025.

Throughout the year, ECJU also engaged bilaterally with a range of other international partners, as well as in multilateral settings, discussing shared challenges in export controls and sharing best practices in export licensing.

5.4 The End-User Advisory Service

Exporters can use this service to request advice on whether ECJU has WMD or military end-use 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 military end-use 'Concerns' letter is sent to the exporter who requested the advice. This recommends they apply for an export licence for the export of goods.

As this is a non-statutory advisory service there are no published targets for responses to End-User Advisory Service enquiries. During 2025 ECJU finalised 9,827 enquiries, a small decrease of 202 from 10,029 enquiries finalised in 2024. 1,085 WMD and MEUC 'Concerns' letters were sent in 2025. This compares to 905 in 2024, and 1,358 in 2023.

Section 6:

HM Government support to Allies and Partners

6.1 Gifting

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

In 2025, 8 applications to gift equipment (to countries other than Ukraine, which is covered in section 6.4) were approved. Four of those applications were in pursuit of the aims established by the Integrated Security Fund (ISF), one each for Senegal, Ghana, Gambia and Sierra Leone.

The ISF is the sole cross-government fund tackling the highest priority threats to UK national security, both at home and overseas. It was created as a means of bringing together Conflict Stability and Security Fund (CSSF) work overseas with domestic programmes like the National Cyber Programme and the Economic Deterrence Initiative.

Two applications to supply Counter-Improvised Explosive Device (C-IED) kit to Morocco and Kenya were financed by the Defence Assistance Fund (DAF) and sponsored by the MOD Counter Explosive Ordnance Defence Engagement Office.

The DAF is an internal Ministry of Defence resource used to help to develop and maintain bilateral defence relationships in support of wider HM Government objectives.

The Crown is not bound by the provisions of the Export Control Act 2002 for goods specified by Schedule 2 of the Export Control Order 2008 (i.e. the UK military list which forms part of the UK Strategic Export Control Lists). As a result, Schedule 2 goods which are owned by the UK Government do not require an export licence when they are being exported. This is known as the Crown Exemption.

In the case of gifts of dual-use items (including software and technology), which are owned by the Crown, the items are exported under a specific open licence for use by the UK Government (Open Licence - Export of Dual-Use Goods by the Crown)

All proposals to gift controlled military equipment and dual-use equipment, including gifts funded through the ISF and DAF, are assessed on a case-by-case basis against the Strategic Export Licensing Criteria, in the same way as commercial 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.

If the gifting application is approved, and the goods remain Crown owned until transfer overseas then the goods are exported under this Crown Exemption or the Open Licence for dual-use items.

Gifts exceeding £300,000 in value are notified to Parliament before the gift is made. No gifts fell into this category in 2025.

Table 6.1* Gifted controlled equipment in 2025[20]

Country	End-User	Goods Description	Sponsoring Department	Approx. Value £
Nigeria	Nigerian Army HQ	Counter-Improvised Explosive Device equipment	MOD	46,000
Germany	RAF Bruggen Museum	1 x Jaguar GR1 XX969 with engines and seat 1 X Tornado GR4 ZD711 with engines and seats	MOD	40,000
Morocco**	Direction Generale de la Surete Nationale (DGSN) EOD Training Centre	Counter-Improvised Explosive Device equipment	MOD	54,000
Kenya**	The Humanitarian Peace Support School in Nairobi	Counter-Improvised Explosive Device equipment	MOD	45,000
Senegal***	Senegal Armed Forces in Dakar	2 X Furuno Radar FAR2238S-NXT BB	MOD	95,000
Ghana***	Armed Forces of Ghana	1 x Halmatic Pacific 22 Rigid Hull Inflatable Boat (RIB) and spares plus 1 x trailer	MOD	71,000

20 Figures are rounded to the nearest 1,000

Country	End-User	Goods Description	Sponsoring Department	Approx. Value £
Gambia***	Armed Forces of Gambia	2 x Halmatic Pacific 22 Rigid Hull Inflatable Boat (RIB) and spares plus 2 x trailer	MOD	142,000
Sierra Leone***	Armed Forces of Sierra Leone	2 x Halmatic Pacific 22 Rigid Hull Inflatable Boat (RIB) and spares plus 2 x trailer	MOD	142,000

*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 26 March 2026.

**Equipment purchased through the Defence Assistance Fund.

***Equipment purchased through the Integrated Security Fund.

6.2 Government to Government Exports

The National Armaments Director Group of the MOD can act as the contracting agent between UK industry and a foreign nation to enact a government-to-government export. Table 6.2 sets out these exports signed in 2025 by destination, equipment type and quantity. The Typhoon aircraft will be exported at a future date.

The National Armaments Director Group may also resell certain military equipment that is surplus to the requirements of the UK Armed Forces directly to a foreign government as part of disposal activities. These resales are subject to licensing controls. Table 6.3 sets out these sales signed in 2025 by destination, equipment type and quantity and with a minimum value of £1 million.

Table 6.2* Government-to-government exports

Country	Type of Equipment	Quantity
Turkey	Typhoon Aircraft & Services	20

*Data is based on Management Information records as of 26 March 2026

Table 6.3* Resales to foreign governments

Country	Type of Equipment	Quantity
Turkey	C130J Aircraft	12
Brazil	Albion Class Ship	1
Singapore	Apache Helicopter Inventory	Inventory – multiple lines

*Data is based on Management Information records as of 26 March 2026.

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 2025, the UK continued to provide substantial support for in-service aircraft, and their associated systems. Where goods were exported under export licences obtained by industry, the data is included in the corresponding Strategic Export Controls Quarterly Reports.

Section 7:

International Issues

7.1 Ukraine/Russia

As Russia's full-scale illegal invasion entered its fourth year, the UK continued to play a leading role in supporting Ukraine. In addition to diplomatic support, HMG provided Ukraine with significant military aid, both lethal and non-lethal. In 2025, the UK provided an unprecedented £4.5 billion in military support to Ukraine, including £1.5 billion through our Extraordinary Revenue Acceleration (ERA) loan, backed by the proceeds from immobilised Russian sovereign assets.

HMG continues 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
- coordinating international procurement through the UK-led International Fund for Ukraine (IFU) and UK-administered NSATU Trust Fund, as well as through our support to the Capability Coalitions of which the UK jointly leads the Drone and Maritime coalitions

HMG has also invested significantly in Equipment Support so that Ukraine is able to service and repair the equipment that the UK and other partners have supplied to Ukraine.

ECJU has continued to treat all licence applications to Ukraine from UK Industry as priority cases. The MOD team within ECJU is responsible for managing gifting applications from HMG, providing assessments and seeking advice from advisory departments, such as the FCDO and have also treated 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 2025:

- approximately 1,000 short range surface-to-air and air defence missiles including Storm Shadow and Lightweight Multirole Missiles, as well as several air defence systems

- dozens of artillery systems, and more than 150,000 artillery rounds
- more than 300 armoured vehicles, protected mobility and logistic support vehicles
- hundreds of units of communication, SATCOMS, radar, electronic warfare, GPS systems and surveillance and targeting equipment
- dozens of infrastructure and engineering items including generators, maintenance and bridging capabilities
- circa 35,000 uncrewed systems
- thousands of spares, vehicle spares, ancillaries, parts, tools, support kits, medical items and PPE
- hundreds of weapons systems
- over 5 million rounds of ammunition including ammunition and anti-armour weapons
- dozens of maritime equipment including boats, spares and lifesaving items

HMG issued 440 licences for Ukraine in 2025, including 44 related to gifting.

The UK also continued to implement an extensive system of sanctions and export controls for Russia. These sanctions targeted Russia's defence industry and those supporting and facilitating Russia's invasion of Ukraine and occupation of the annexed territories; they also dealt with sanctions evasion, including in third countries.

Export controls continued to prove vital in restricting Russia's access to critical goods and technologies. ECJU and the Office for Trade Sanctions Implementation (OTSI) considered all licence applications for export to Russia in line with the statutory guidance, supporting compliance with The Russia (Sanctions) (EU Exit) Regulations 2019. This guidance sets out considerations for granting trade sanctions licences, including for the purposes of divestment from Russia. OTSI and ECJU continued to support companies who wished to divest, where to do so was in line with the aims of the sanctions.

OTSI and ECJU also continued to ensure export licence applications both to Russia and third countries were robustly assessed in view of potential sanctions circumvention. HM Government has developed the Common High Priority List (CHPL), which highlights items that pose a heightened risk of illegal diversion to Russia due to their importance to Russia's war efforts. OTSI and ECJU carried out important engagement with exporters to highlight CHPL high-risk countries and scrutinised applications closely to consider CHPL alongside broader diversion risks.

7.2 Israel

Throughout 2025 HM Government's assessment remained that Israel was not committed to upholding International Humanitarian Law in Gaza. ECJU therefore continued to refuse licences where there was a risk exports might be used by Israel for military operations in Gaza.

ECJU continued to approve licences where to do so was in accordance with the Strategic Export Licensing Criteria. Examples included personal protective equipment for non-combatants (NGO staff and journalists), imaging equipment for non-military purposes, chemicals for use in laboratory testing, or software for use in advanced manufacturing processes. Public and Parliamentary interest in this topic remained exceptionally high. In August 2025, ECJU therefore published a further Management Information release, outlining the number of extant licences involving Israel, the number of such licence applications in the pipeline, and the number and outcome of decisions made.[21]

UK components for the global pool of the multi-national F-35 joint strike fighter programme continued to be excluded from the suspension decision, except parts going directly to Israel, which remained suspended. An NGO challenged HM Government's decision making on this exemption. The High Court dismissed the claim, finding HM Government's decision was lawful, careful and thorough. The Court of Appeal also upheld HM Government's decision in a subsequent appeal. Due to Israel's twelve-day conflict with Iran in June 2025, ECJU conducted a 'Change in Circumstances' (CiC) Review to assess implications for export licensing. That exercise confirmed that there are no relevant licences which might be used in Israeli actions in Lebanon or Iran. Strong Parliamentary, public and media interest in Israel strategic export control issues remained. In September 2025, DBT, MOD and FCDO ministers gave oral evidence to the Business and Trade Committee on Arms exports to Israel (see section 5.1).

7.3 Sudan

Sudan and South Sudan are subject to UK arms embargoes under the Sanctions and Anti-Money Laundering Act. During the year we reviewed more than 3,000 old and extant licences to consider the risk of diversion to Sudan from the UAE and other originating or transit countries. We carefully reviewed all reports we received, but despite media reports on the scale and nature of UK exports found in Sudan we saw no evidence of UK weapons or ammunition being used in Sudan. All export licence applications were assessed as standard against the risk of diversion, including to Sudan, and were kept under careful and continual review.

7.4 Armenia/Azerbaijan

Armenia and Azerbaijan made significant progress in advancing peace, including by initialling a peace agreement and signing a joint declaration. In view of this, the UK lifted its embargo on Armenia and Azerbaijan on 13 October 2025, as set out in a Written Ministerial Statement laid on this date. This meant that weapons, ammunition and munitions were no longer subject to an embargo but, as with all licence applications for controlled goods, continued to be assessed against the UK Strategic Export Licensing Criteria.

The UK has since upgraded its bilateral relationships with Armenia and Azerbaijan to Strategic Partnerships. This decision, alongside the decision to lift the arms embargo on Armenia and Azerbaijan fully, enabled the UK's security and defence partnerships to evolve and grow.

7.5 Thailand/Cambodia

HMG reviewed extant licences and new export licence applications for Cambodia and, more significantly by volume, for Thailand, in light of border clashes that escalated from May to July 2025 and again in December 2025. ECJU paid particularly close attention to Criterion 4, on the preservation of peace and security, as well as considering Criterion 2c, regarding international humanitarian law, should it be determined that an armed conflict was underway or might later

21 https://www.gov.uk/government/publications/export-control-licensing-management-information-for-israel

ensue, alongside usual considerations of all other Strategic Export Licensing Criteria. Following the ceasefire of 27 December 2025, and public commitments to peace from both sides, ECJU returned to processing export licence applications, while still exercising caution.

7.6 Rwanda

The HM Government reassessed export licensing considering regional peace and security following Rwandan advances into eastern Democratic Republic of Congo (DRC) in January 2025 and revoked four SIELs and removed Rwanda as a permitted destination from two OIELs and four OGELs (more detail on OGEL changes in Annex C).

7.7 Madagascar, Nepal and Tanzania

ECJU conducted reviews of export licences to consider human rights in light of protests including in each of these countries during 2025. The conclusion of these reviews was that there were no licences in scope to be considered for suspension, revocation or amendment.

7.8 Iran

On 28 August 2025, the UK, Germany and France triggered a mechanism in the 2015 Iran nuclear agreement to introduce snapback sanctions against Iran. The UK continued to maintain its arms embargo and restrictions on Iran's ballistic missile programme.

7.9 China

HMG notified UK exporters in January and February 2025 of the goods and technology most at risk of diversion to Russia in circumvention of sanctions, with China, including Hong Kong and Macau, on the list of higher risk destinations. Otherwise, the approval of export licence applications for China in 2025 was consistent with the then Foreign Secretary's announcement to Parliament in June 2025 of the China audit, which noted that China and Hong Kong were together the UK's third largest trading partner.

Section 8:

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 the ongoing commitment to keep our approach to export licensing under review, in 2023 and 2024 ECJU led cross-government internal reviews of the operation of the MEUC and a broader examination of 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.

Given the thematic overlap, because use of the enhanced MEUC was important to addressing concerns with rapidly developing emerging technologies, these reviews were merged and concluded over the summer of 2025.

Some of the conclusions and recommendations of the reviews agreed by the National Security Council were:

- that the UK export control system is agile and effective at managing risks arising from the development and use of emerging technologies
- to consider the effect of new and existing controls will require closer engagement across government on assessments of controlled emerging technologies, as well as greater international coordination with partners
- increased engagement and guidance for exporters most affected by the enhanced MEUC would better support UK industry navigate the controls

In 2025, as a consequence of this review, ECJU began a new programme of exporter engagement with businesses and research organisations affected by the extended MEUC, initiating a series of business engagement sessions.

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. The ATT had 118 State Parties as of 31 December 2025.

In August 2025, the UK promoted an agreement for the development of its first 5-year strategy at the Eleventh Conference of States Parties (CSP11), building on the Political Declaration the UK promoted at CSP10 in 2024. The strategy should help encourage implementation of core ATT commitments, including establishing national control lists. It should also enable better measurement of the ATT's effect.

8.3 Small Arms and Light Weapons (SALW) and Conventional Ammunition

As well as applying our own strict export control criteria to exports of SALW and conventional ammunition, the UK continues to support international efforts to strengthen national, regional and international controls on SALW, ammunition and their international transfer, including the UN Programme of Action on SALW (POA). This prevents SALW falling into the hands of terrorists, organised criminals, and other unintended recipients.

In 2025, the UK participated in the first preparatory meeting of the new Global Framework for Through Life Conventional Ammunition Management and contributed thematic ideas for the work of future technical discussions, including the first Meeting of States in 2027.

The UK has continued to support the implementation of the POA and Global Framework, through projects in Nigeria and Somalia, including Somaliland, as well as providing renewed capacity building and training support to Kazakhstan and Moldova.

8.4 Nuclear Suppliers Group (NSG)

The NSG seeks to prevent the proliferation of nuclear weapons through the adoption into national export control guidelines on the transfer of nuclear and nuclear-related material, dual-use material, equipment, software and technology. These guidelines are intended to allow states to trade with confidence and enable international cooperation on peaceful uses of nuclear energy, consistent with, international legally binding nuclear non-proliferation instruments.

As of March 2026, there were 48 participating governments. The European Commission and Chair of the Zangger Committee participate as observers. The NSG Plenary was in Cape Town (21 to 25 July 2025). And it held additional technical meetings in Vienna twice annually.

8.5 Zangger Committee

The Zangger Committee consists of 39 states, which has the remit to serve as the "faithful interpreter" of Article III(2) of the Treaty on the Non-Proliferation of Nuclear Weapons (NPT) to harmonise the interpretation of nuclear export control policies for NPT States Parties regarding "especially designed or prepared equipment or material for the processing, use or production of special fissionable material". The Zangger Committee maintains a trigger list of nuclear-related strategic goods to assist NPT States Parties to identify equipment and materials subject to export controls. The Zangger Committee trigger list forms the basis of the NSG Trigger List and is reviewed regularly to ensure alignment with the NSG.

The UK acts as Zangger Committee secretariat.

8.6 Australia Group (AG)

The AG seeks to prevent the proliferation of chemical and biological weapons by harmonising national export controls on relevant chemicals, biological agents, dual-use equipment, software and technology. The AG's Common Control Lists and guidelines are intended to ensure that legitimate trade and international scientific cooperation for peaceful purposes can continue with confidence, while preventing diversion to chemical or biological weapons programmes.

As of March 2026, the AG comprised 42 Participating States and the European Union. Australia acts as Chair and provides the permanent secretariat. The AG meets for an annual plenary, supplemented by intersessional discussions, including technical, licensing and enforcement exchanges.

In July 2025, the AG Plenary met in Sydney to mark the Group's 40th anniversary[22] Participants reaffirmed their commitment to countering the proliferation of chemical and biological weapons, their strong support for the Chemical Weapons Convention and the Biological and Toxin Weapons Convention.

During 2025, the AG considered global proliferation trends, emerging technologies and procurement methods of concern. Participating States also considered updates to the AG Common Control Lists to ensure they remain responsive to scientific and technological developments, while avoiding unnecessary constraints on industry and academia.

The UK is an active participant in the AG and supports efforts to strengthen the effectiveness and international relevance of the regime.

8.7 Missile Technology Control Regime (MTCR)

The MTCR[23] is a politically binding instrument and currently consists of 35 Participating States. The MTCR guidelines and lists of controlled items form an international benchmark for controlling exports of missile-related items and technologies including long-range UAVs. The UK is a founding member and plays a leading role, including as part of the MTCR's Technical and Law Enforcement Experts Groups.

In 2025, debate over who should hold the MTCR Chair meant no plenary was held. Brazil continued as interim Chair until the Reinforced Point of Contact (RPOC) meeting hosted between the 13 and 14 of May 2025 by France.

The UK continues to engage at a technical level on proposals to enhance the MTCR.

8.8 Wassenaar Arrangement (WA)

The WA[24] contributes to international security and stability by promoting transparency and helping to prevent destabilising accumulations of conventional arms and associated dual-use goods and technologies.

22 https://www.dfat.gov.au/publications/minisite/theaustraliagroupnet/site/en/2025-ag-plenary-statement.html
23 https://mtcr.info/
24 https://www.wassenaar.org/genesis-of-the-wassenaar-arrangement/

In 2025, the UK engaged in WA technical expert discussions, information exchange on current and emerging global issues and licensing and enforcement issues.

UK officials attended the WA plenary in December 2025. The UK highlighted Russia's illegal war of aggression in Ukraine, as well as China and Democratic People's Republic of Korea (DPRK)'s military support for that war.

The WA plenary considered technical expert recommendations for revised control lists, with 40 recommendations achieving consensus.

8.9 The Hague Code of Conduct (HCoC)

The 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. The HCoC currently has 145 signatories who voluntarily commit themselves politically to provide pre-launch notifications on ballistic missile and space-launch vehicles and test flights. Additionally, Subscribing States commit themselves to submit annual declarations of their countries policies on ballistic missiles and space-launch vehicles.

The UK continues to actively participate in the HCoC, and officials attended the Annual Regular Meeting (ARM) where discussions concentrated on Asia-related issues, including China and the DPRK, as well as issues relating to Iran and to Russia's illegal war of aggression in Ukraine. The UK condemned Russia's actions in Ukraine, drew attention to the DPRK and Iran's ballistic missile programmes and supported steps to universalise the HCoC to all states.

8.10 Academic Technology Approval Scheme (ATAS)

The ATAS scheme aims to safeguard and prevent the misuse of scientific research and sensitive engineering technologies linked to advanced conventional military capabilities, weapons of mass destruction, and their delivery systems.

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

In 2025, ATAS approved 28,370 applications, of which 23,999 were students and 4,371 were researchers. Clearance was denied on 1,343 occasions, of which 997 were students and 346 researchers.

The UK conducted meetings throughout the year to discuss academic security with several partner countries.

Section 9:

Compliance and enforcement

9.1 Compliance

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

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

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

- first compliance contact - with the aim to conduct this after the first registration with, or issuance of, the licence(s)
- 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 significant staff
- re-visits - 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, and 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 are 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. 33 companies were contacted in 2025 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 2025 the Compliance Unit continued to concentrate on priority sites to visit, including those that had not had an inspection for a number of years (see Tables 9.1 to 9.5).

The focus for 2025 was to maintain priority targeted and intelligence led audits, as training of the newer inspectors was completed. In doing so, the compliance team have achieved a 41% increase in the number of inspections since 2024 (see Table 9.1).

The Compliance Team also carried out 1 to1 meetings with exporters at the Export Control and Sanctions Symposium in London in October 2025, supporting industry with their Open General Licence usage and reporting requirements.

Table 9.1* Compliance checks undertaken

Outcomes	2025	2024	2023
Number of compliance checks undertaken	383	270	244

*Data is based on management information records as of 1 April 2026.

Table 9.2* Compliance checks – substantive infractions

Outcomes	2025	2024	2023
Number of warning letters	66	41	42
Number of suspensions	2	0	1

*Data is based on management information records as of 1 April 2026.

The Compliance Team issued 66 warning letters for non-compliant outcomes to company directors during 2025, 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. Two exporters had a licence suspended due to repeat infractions.

The reasons for a non-compliant outcome in 2025 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) 2025	% (count) 2024	% (count) 2023
Compliant	33% (26)	29% (15)	36% (17)
Generally compliant	22% (17)	25% (13)	34% (16)
Not fully compliant	21% (16)	24% (12)	15% (7)
Non-compliant	24% (19)	22% (11)	15% (7)

* Data is based on management information records as of 1 April 2026.

Table 9.4* Compliance checks - outcome of routine compliance checks

Outcome of routine compliance checks**	% (count) 2025	% (count) 2024	% (count) 2023
Compliant	37% (82)	31% (52)	33% (53)
Generally compliant	27% (60)	20% (34)	30% (48)
Not fully compliant	19% (42)	28% (47)	16% (25)
Non-compliant	18% (40)	20% (33)	22% (35)

* Data is based on management information records as of 1 April 2026.

** Percentages may not sum to 100% due to rounding.

Table 9.5* Compliance checks - outcome of revisits

Outcome of Revisits**	% (count) 2025	% (count) 2024	% (count) 2023
Compliant	63% (38)	66% (29)	75% (27)
Generally compliant	15% (9)	11% (5)	17% (6)
Not fully compliant	13% (8)	11% (5)	6% (2)
Non-compliant	8% (5)	11% (5)	3% (1)

* Data is based on management information records as of 1 April 2026.

** Percentages may not sum to 100% due to rounding.

9.2 Enforcement

HMRC does not provide direct advice on export licence applications but has an important 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.

Statistical data related to HMRC's sanctions enforcement activity will be published separately in HMRC's Annual Reports and Accounts (ARA): https://www.gov.uk/government/publications/hmrc-annual-report-and-accounts-2024-to-2025.

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.

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

HMRC continued to work with Border Force and UK prosecuting authorities to undertake a wide range of enforcement activity throughout 2025. This activity included:172 seizures of strategic goods. These are cases where goods were presented for export and found to be in breach of licensing requirements and/or embargoes (see Table 9.7):

- 77 end-use cases, where non-listed items were stopped from leaving the UK and brought within export controls; this control is used if there is a risk that the goods would be put to an illicit military or WMD end-use
- HMRC issued 4 compound settlements totalling £4,294,409.64 for unlicensed exports of military goods or dual-use goods
- 212 HMRC warning letters issued as a result of voluntary disclosures
- HMRC achieved positive charging decisions by prosecution authorities for 2 criminal cases in 2025

HMRC assesses all breaches of strategic export controls. 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 10 criminal investigations in respect of suspected breaches of strategic export controls were ongoing in 2025. Of these 10 criminal investigations, 4 are awaiting trial in the courts following a positive charging decision issued by the Crown Prosecution Service. The remaining investigations are ongoing. 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 if they do so, the case will subsequently be referred to UK prosecution authorities.

HMRC continues to receive and review voluntary disclosures made by exporters. These disclosures are assessed by HMRC, and appropriate action taken. This ranges from awareness visits to help exporters to get it right in the future, 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 2025.

Table 9.6* Voluntary disclosures outcomes in 2025

Disposal	2025	2024	2023
Voluntary Disclosures received	267	310	260
Warning Letters issued as a result of voluntary disclosures	212	167	216
No Further Action (NFA) letters issued**	95	68	105
Compound settlement offers issued as a result of voluntary disclosures	4 offers totalling £4,294,409.64	14 offers totalling £5,069,157.20	9 offers totalling £2,276,390.77

* All above data is based on Management Information records as of 31 March 2026. 2025 data is exclusive of strategic exports and does not include sanctions enforcement outcomes.

** 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 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 improves the capabilities of our international partners. HMRC supports the international export control 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 Missile Technology Control Regime (MTCR) Nuclear Suppliers Group (NSG), Australia Group (AG) and Wassenaar Arrangement (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 seizures for 2025.

Year	Total
2025	172
2024	233

Year	Total
2023	266
2022	177
2021	202

* Data is based on Management Information records as of 31 March 2026. 2025 data is exclusive of strategic exports and does not include sanctions enforcement outcomes.

Table 9.8* Convictions

Year	Goods	Destination	Individual / company	Offence	Penalty
2025	-	-	-	-	-
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, ordered to pay £9,359.80.
2023	-	-	-	-	-
2022	4kgs disodium sulphide hydrate	Pakistan	VWR 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	-	-	-	-	-

* Data is based on Management Information records as of 31 March 2026.

Annex A:

The Strategic Export Licensing Criteria

Taken from the Statement to Parliament on 8 December 2021[25]

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;

25 https://questions-statements.parliament.uk/written-statements/detail/2021-12-08/hcws449

f) the OSCE principles governing conventional arms transfers.

Criterion Two

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

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

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

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

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

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

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

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

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

Criterion Three

Preservation of internal peace and security

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

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

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

b) Whether the items are likely to be used other than for the legitimate national security or defence of the recipient;

c) Whether the items would be likely to cause, avert, increase or decrease conflict or instability in the country of final destination, taking into account (inter alia):

   (i) the balance of forces between states or actors concerned;

   (ii) the potential for the equipment to have a significant impact on the effectiveness of existing capabilities or force projection;

   (iii) humanitarian purposes or impacts;

   (iv) the nature of the conflict, including the conduct of all states or actors involved, and any involvement by the UK and allied states;

   (v) border stability and legitimate national security interests of the recipient.

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

Criterion Four

Preservation of peace and security.

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

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

a) The existence or likelihood of armed conflict in which the recipient would take part;

b) Whether the recipient has in the past tried or threatened to pursue, by means of force, a claim against the territory of another country;

c) The likelihood that the items would be used in the territory of another country other than for legitimate purposes, including national or collective self-defence;

d) Whether the items would be likely to cause, avert, increase or decrease conflict or instability in the region, taking into account (inter alia):

   (i) the balance of forces between the states or actors in the region concerned;

   (ii) their approach to expenditure on defence;

   (iii) the potential for the equipment to have a significant impact on the effectiveness of existing capabilities or force projection;

   (iv) humanitarian purposes or impacts;

   (v) the nature of the conflict, including the conduct of all states or actors involved, and any involvement by the UK and allied states;

(vi) border stability and legitimate national security interests of the recipient.

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

Criterion Five

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

The Government will take into account:

a) the risk of the items undermining or damaging the UK's national security or those of other territories and countries as described above;

b) the risk of the items being used against UK forces or against those of other territories and countries as described above;

c) the need to protect classified information and capabilities.

Criterion Six

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

a) Having assessed the potential that the items could be used to commit or facilitate an act constituting an offence under international conventions or protocols to which the UK is a Party relating to terrorism or transnational organised crime, the Government will not grant a licence if it determines there is a clear risk that the items could be used to commit or facilitate such an act. In making this assessment, the Government will also take account of the risk that the items might be used to commit or facilitate gender-based violence or serious acts of violence against women or children.

b) The Government will also take into account, inter alia, the record of the buyer country with regard to:

   (i) its compliance with relevant international obligations, in particular on the non-use of force, including under international humanitarian law applicable to international and non-international conflicts;

   (ii) its commitment to non-proliferation and other areas of arms control and disarmament, in particular the signature, ratification and implementation of relevant arms control and disarmament instruments referred to in Criterion One.

Criterion Seven

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

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

a) the legitimate defence and domestic security interests of the recipient country, including any involvement in United Nations or other humanitarian or peace-keeping activity;

b) the technical capability of the recipient country to use the items;

c) the capability of the recipient country to exert effective export controls;

d) the risk of re-export to undesirable destinations;

e) the risk of diversion to terrorist organisations, individual terrorists or to transnational organised crime;

f) the risk of reverse engineering or unintended technology transfer;

g) the risk of an undesirable end-use either by the stated end-user or another party.

Criterion Eight

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

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

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

Other Factors

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

Annex B:

Licence type definitions

Standard Individual Export Licences (SIELs)

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

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

Open Individual Export Licences (OIELs)

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

Applications must include items to be exported and destinations, but specific quantities and named end users do not necessarily need to be provided before a licence is issued. This data must be provided over the lifetime of the licence. The rejection of an application for an OIEL; or an amendment to exclude destinations and/or items; or the revocation of an OIEL, does not prevent a company from applying for SIELs covering some, or all 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 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 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 Transhipment Licences (SITLs)

A SITL is specific to a named transit/transhipment 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 Transhipment 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 we 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.

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. 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.

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.

Professional and Business Services 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.

The Office of Trade Sanctions Implementation (OTSI), part of the Department for Business and Trade, was launched in October 2024, and has been processing professional and business services applications submitted via its online application service since its launch on 10 October 2024. ECJU, also part of the Department for Business and Trade, concluded 11 applications during this reporting period.

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, and Schedule 3DA revenue generating goods to a person connected with Russia.

Licence for energy-related goods

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

Licences for drugs used in execution by lethal injection

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

- Amobarbital (CAS RN 57-43-2)
- Amobarbital sodium salt (CAS RN 64-43-7)

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

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

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

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

Global Project Licences (GPLs)

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

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

Annex C:

A summary of key changes affecting OGELs in 2025

February –

The Open General Export Licence (OGEL) (exports in support of Joint Strike Fighter: F-35 Lightning II) was updated to include Greece as a permitted destination.

The following OGELs were updated to remove Rwanda as a permissible destination:

- military goods: for demonstration
- export for repair/replacement under warranty: military goods
- PCBs and components for military goods
- software and source code for military goods

March –

The Open General Licence (AUKUS Nations) was revised to better align with the US excluded technologies list.

April –

The Open General Export Licence oil and gas exploration: dual-use items was updated to permit exports to the continental shelf of coastal destinations which are themselves included as permitted destinations. It was then updated to reinclude the UK Continental Shelf as a permitted destination.

The General Trade Licence for Syria Sanctions - earthquake relief efforts in Syria was revoked. This followed changes to the underlying Regulation which made the General Trade Licence redundant.

May –

The following OGELs were revised to exclude nuclear power generating and naval nuclear propulsion equipment under ML17g and ML9 from the scope of the licence:

- Open General Export Licence access overseas to software and technology for military goods: individual use only
- Open General Export Licence (export after exhibition or demonstration: military goods)

- Open General Export Licence export after repair/replacement under warranty: military goods
- Open General Export Licence export for exhibition: military goods
- Open General Export Licence export for repair/replacement under warranty: military goods
- Open General Export Licence (military components)
- Open General Export Licence (military goods and technology: India)
- Open General Export Licence technology for military goods

The following OGELs were revised to exclude naval nuclear propulsion equipment under ML9 from the scope of the licence:

- Open General Export Licence (certified companies)
- Open General Export Licence military goods: for demonstration
- Open General Export Licence (military goods, software and technology)
- Open General Export Licence (military goods, software and technology: government or NATO end-use)
- Open General Export Licence software and source code for military goods

July –

The General Trade Licence (Russia Sanctions – Sectoral Software and Technology) was first published.

October –

The Open General Licence: Open General Licence (AUKUS Nations) had updated text on the Authorised User Community, clarification on F680 requirements and updates to the scope of items not permitted by the licence.

The General trade licence Russia sanctions – sectoral software and technology was reissued with an extended validity date.

Annex D:

OGELs and other general licences in force in 2025

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
- 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

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 – Sectoral Software and Technology)

Open General Transhipment 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
- Transhipment 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

Assimilated General Export Authorisations –

- 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

Union General Export Authorisations –

- 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

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