

Chaudfontaine Newsletter

on dual-use items trade controls



ISSUE #58
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LEGAL DEVELOPMENTS: EUROPEAN UNION

Council

On 24 February, the Council published the 16th package of sanctions on Russia's war of aggression against Ukraine. Available [here](#).

Agendas for the Working Party on dual-use goods meetings: 15 January, available [here](#); 10 February, available [here](#); 12 March, available [here](#).

France

On March 27, France has adopted a new order updating its national controls on dual-use items, adopted on the basis of article 9 of EU dual-use Regulation 2021/821. Available (in French) [here](#).

The Netherlands

On 1 April 2025, the Netherlands will modify its national export control measure for advanced semiconductor manufacturing equipment. As of that date more types of technology will be subject to a national authorisation requirement. Available [here](#).



LEGAL DEVELOPMENTS: INTERNATIONAL

Australia

Starting 1 March, the compliance transition period will end, and three new offences under Australia's export controls regime, along with their associated penalty provisions, will come into effect. Available [here](#).

China

On 24 March, China State's Council published the Implementation Rules for the Anti-Foreign Sanctions Law, including inter alia prohibitions or restrictions on import/export activities related to China. Available [here](#).

Japan

On 31 January, Japan's Ministry of Economy, Trade and Industry has added 42 organisations to its Foreign User List of entities potentially linked to weapons of mass destruction development. Available (in Japanese) [here](#).

Taiwan

On 4 March, Taiwan has added to its Strategic High-Tech Commodities (SHTC) Entity List. Available [here](#).

United Kingdom

On 20 March, the UK ECJU published an update to the AUKUS open general export licence to better align with the US excluded technologies list. Available [here](#).

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On 11 March, the UK ECJU published an advance notice of the upcoming updates to the UK strategic export control list. Available [here](#).

On 6 March, the UK ECJU published guidance on how assimilated GEA licences authorise the export of certain controlled items to specified countries. Available [here](#).

On 26 February, the UK ECJU published the notice on changes to permitted destinations on 4 open general export licences. Available [here](#).

On 7 February, the UK ECJU updated the Guidance on Standard individual export licences (SIELs). Available [here](#).

United States

On 28 March, BIS added 70 entities to the Entity List, under the destinations of China, People's Republic of (China) (42); Iran (2); Pakistan (19); South Africa (3); and the United Arab Emirates (UAE) (4). Available [here](#).

On 28 March, BIS added 12 entities to the Entity List, under the destinations of China, People's Republic of (China) (11) and Taiwan (1). Available [here](#).

On 20 January, President Trump signed the America First Trade Policy Memorandum, implementing significant reforms to U.S. trade policy. Available [here](#).

On 16 January, BIS published "Implementation of Additional Due Diligence Measures for Advanced Computing Integrated Circuits; Amendments and Clarifications; and Extension of Comment Period". Available [here](#).

On 13 January, BIS updates export controls on advanced computing and adds new control on artificial intelligence (AI) model weights for certain advanced closed-weight dual-use AI models. Available [here](#).



MEMBERS' WORKS

Enzo Caponetti, "16th package of EU sanctions: EU reaction to Russian invasion of Ukraine (regularly updated)", ESU, 7 March. Available [here](#).

Lauriane Héau, "The Relevance of Dual-Use Export Controls for Gulf States," Prisme Initiative, March. Available [here](#).

Lauriane Héau, "The EU Research Security Initiative: Implications for the Application of Export Controls in Academia and Research Institutes", EU Non-Proliferation and Disarmament Papers, No. 94, March 2025. Available [here](#).

John Caves and Valerie Lincy, "Maximum Pressure on Iranian Arms Production: How aggressive export controls can support U.S. policy objectives on Iran," Iran Watch, Wisconsin Project on Nuclear Arms Control, 27 February 2025. Available [here](#).

Kolja Brockmann and Lauriane Héau, "Spyware as a service: Challenges in applying export controls to cloud-based cyber-surveillance software", SIPRI Topical Backgrounder, 17 February. Available [here](#).



STUDIES AND MORE: ARTICLES, REPORTS, LINKS

"China strengthens anti-foreign sanctions law amid growing US tensions," World ECR, 27 March. Available [here](#).

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On 25 March, the Commission launched helpdesk to support EU SMEs comply with sanctions. Available [here](#).

Noriya Ishikawa et al., "Japanese policy and regulatory developments," Nishimura & Asahi Europe Rechtsanwalts-gesellschaft mbH, March. Available [here](#).

Christopher J. Watterson, Egor Kartuzov, Steve Osborne, "The obstruction of customs enforcement at privately operated port terminals: A study of Chinese state-owned enterprises," Journal of Strategic Trade Control, Vol. 3, (March 2025). Available [here](#).

On 19 March, the UK ECJU published guidance on trade sanctions, arms embargoes, and other trade restrictions. Available [here](#).

Sean Wilson, "Missile Technology Control Regime Reform: Key Changes and Next Steps," Aerospace CSIS, 14 March. Available [here](#).

Lery Hiciano, "How Taiwan's Chip Industry Navigates US Industrial Policy and Export Controls," Global Taiwan Institute, 5 March. Available [here](#).

On 4 March, the UK ECJU published notice on compound settlement offer for breaches of export control. Available [here](#).

On 25 February, the UK ECJU updated the guidance for UK exporters on countering Russian sanctions evasion and circumvention. Available [here](#).

Isaac B. Kardon and Milo McBride, "Rocks vs. Chips - How the U.S.-China competition is playing out for high-tech

advantage," Carnegie Endowment, 14 February. Available [here](#).

Anne Petterd and Kirsten Foley, "Australian offences for new export controls regime commence 1 March 2025," Baker McKenzie, 17 February. Available [here](#).

Kyoji Fukao and Ivan Deseatnicov, "US export controls and the restructuring of global value chains: An analysis of Japanese multinationals' exits from China," Centre for economic policy research, 14 February. Available [here](#).

On 27 February, the UK ECJU published export control licensing data for 1 July to 30 September 2024. Available [here](#).

On 30 January, the Commission published the Report on the implementation of Regulation (EU) 2021/821 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items, available [here](#), and the accompanying document to the Report, "Comprehensive data sets related to export controls of dual-use items for the year 2022," available [here](#).

Sylwia Lis, Alexandre Lamy and Patrick De Lapérouse, "BIS Issues Interim Final Rule and Call for Comments on New Export Controls on Artificial Intelligence and Advanced Computing Integrated Circuits," Baker McKenzie, 27 January. Available [here](#).

Thomas Reinhold et al., "Artificial intelligence, non-proliferation and disarmament: a compendium on the state of the art," EUNPDC non-proliferation and disarmament papers No. 92, January. Available [here](#).

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Kerry B. Contini and Alexandre Lamy, “Trump Makes Quick Moves on Sanctions (and Export Control Policy),” Baker McKenzie, 21 January. Available [here](#).

Shih, T., Chubb, A., & Cooney-O’Donoghue, D., “Processing the Geopolitics of Global Science: Emerging National-Level Advisory Structures,” Journal of Studies in International Education, 0(0). Available [here](#).

Catherine Woods, “How Export Controls Endanger the West’s Military Technology Advantage,” RUSI, 9 January 2025. Available [here](#).

“FACT SHEET: Biden-Harris Administration Introduces New Guidance for Missile Technology Exports to Advance Nonproliferation Goals and Bolster Allied Defense Capabilities,” The White House, 7 January. Available [here](#).

“Export Enforcement: 2024 Year in Review,” US Department Of Commerce, 2 January. Available [here](#).

In January, Japan’s Ministry of Economy, Trade and Industry published the second edition of “Security Export – Guidance.” Available [here](#).



During the 45th Session of the World Customs Organizations Enforcement Committee, held from 24 to 28 March, the joint WCO-INTERPOL “List of dual-use commodities related to biological weapons” was presented (the publication has not yet been released to the public). Available [here](#).

Luqman Amin, “Malaysian semiconductor industry unscathed by US AI chip export curbs, but some data centres may face impact — Liew”, The Edge Malaysia, 19 February. Available [here](#).

“Tan See Leng: Singapore will investigate companies bypassing export controls,” The Online Citizen, 18 February. Available [here](#).

“Malaysia has firmly rejected allegations it is being used to smuggle restricted Nvidia AI chips to China, while emphasising its commitment to international export control regulations,” World ECR, 13 February. Available [here](#).

Zuzanna Gwadera, “The US relaxes its missile-transfer policy,” IISS, 10 February. Available [here](#).

“BIS Issues Interim Final Rule and Call for Comments on New Export Controls on Artificial Intelligence and Advanced Computing Integrated Circuits,” Baker McKenzie, 27 January. Available [here](#).

“Israeli Freight Forwarder Sentenced to Two Years in Prison for Violating Export Restrictions Imposed on Russia,” US DOJ, 21 February. Available [here](#).

“US Department of Commerce has expanded space export control oversight,” World ECR, 16 January. Available [here](#).

Hank Berrien, “University Of Michigan Ends Partnership With Communist Chinese University,” daily Wire, 13 January. Available [here](#).

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“BAFA to modernise export controls as part of ‘growth agenda’,” World ECR, 9 January. Available [here](#).

“Canadian National Sentenced to 40 Months for Multimillion-Dollar Export Control Scheme,” US DOJ, 8 January. Available [here](#).



“OF INTEREST”

Dual-use App Assistance – ESU.

Available [here](#).

EU Dual-Use Legislation Inventory – ESU, University of Liège. Available [here](#).

EU Partner-to-Partner (P2P) webpage.

Webpages available [here](#) and [here](#). Newsletters available [here](#).

EU Non-Proliferation and Disarmament Consortium
EUNPD Newsletter (monthly). Available [here](#).

European Export Control Association for Research Organisations (EECARO)

Webpage available [here](#).

Journal of Strategic Trade Control - ESU, University of Liège. Webpage available [here](#).

TIM Dual-Use Web Platform – Joint Research Centre (European Commission). Available [here](#).