

Chaudfontaine Newsletter

on dual-use items trade controls



ISSUE #59

June 2025

Subscribe:

vvella@uliege.be

CONTENTS

01: LEGAL DEVELOPMENTS: EUROPEAN UNION

01: LEGAL DEVELOPMENTS: INTERNATIONAL

02: MEMBERS' WORKS

03: STUDIES AND MORE: ARTICLES, REPORTS, LINKS

03: NEWS

04: "OF INTEREST"



LEGAL DEVELOPMENTS: EUROPEAN UNION

Commission

Commission Recommendation (EU) 2025/683 of 8 April 2025 on coordination of national control lists. Available [here](#).

Council

Council Decision (CFSP) 2025/779 of 14 April 2025 amending Common Position 2008/944/CFSP defining common rules governing control of exports of military technology and equipment. Available [here](#).

On 20 May, the Council published the 17th package of sanctions on Russia's war of aggression against Ukraine (which include dual-use items related measures). Available [here](#).

France

The Consolidated French national control list as of 5 April 2025 is available [here](#) (in French).

Spain

On 31 May, Spain published the updated national control list of dual-use items. Available [here](#) (in Spanish).

The Netherlands

On 7 April, the Netherlands has published the Regulation evoking the National General Export Permit NL 002 and amending the National General Export Permit NL 010 and the General Transit Permit Regulation NL007 (by excluding Israel as a country of final destination). Available [here](#) (in Dutch).



LEGAL DEVELOPMENTS: INTERNATIONAL

Canada

On 6 April, Canada's amendments to its export control list came into effect. Available [here](#).

China

On 10 April, China has announced the adding of 12 US entities to export control list. Available [here](#).

On 4 April, China published the announcement No.18 on the decision to implement export control on some medium and heavy rare earth related items ("in order to safeguard national security and interests and fulfill international obligations such as non-proliferation). Available [here](#).

Chaudfontaine Newsletter

on dual-use items trade controls



ISSUE #59
JUNE 2025

Subscribe:
vvella@uliege.be

Japan

On April 4, a Cabinet Decision was made to amend the export control legislation. Amendments concern new licensing for non-listed items likely to be used in weapons, and stricter controls on exports to certain countries, including those in Group A, to prevent circumvention via third-party regions. Available [here](#).

Switzerland

On 2 April, the Federal Council adopted an amendment to the Goods Control Ordinance, introducing new export controls for dual-use goods in the field of new technologies. This is in response to the blockade of multilateral export controls, and the aim is to align Swiss export controls with those of its main trading partners. Available [here](#).

United Kingdom

On 2 May, the UK published updates on its Export Control Order (2008) and dual-use regime (EU 428/2009 assimilation). Available [here](#).

On 23 April, the UK ECJU updated the open general licence allowing the export of a range of dual-use items in support of contracts within the oil and gas industry, and the related guidance. Available respectively [here](#) and [here](#).

United States

On 13 May, the US Department of Commerce announced rescission of Biden-era artificial intelligence diffusion rule, strengthens chip-related export controls. Available [here](#).



MEMBERS' WORKS

Johan Evers, "Practical implementation of dual-use research and innovation, with focus on SMEs, start-ups and scale-ups" in *Unlocking the potential of dual-use research and innovation*, European Commission, 25 June. Available [here](#).

Veronica Vella, "Practical implementation of dual-use research and innovation, with focus on research performing organisations," in *Unlocking the potential of dual-use research and innovation*, European Commission, 25 June. Available [here](#).

Sánchez Cobaleda, Ana, "¿Límites a la investigación? La normativa europea sobre control de exportaciones en las universidades," *Revista Española De Derecho Internacional*, (2025) 77(1), June. Available [here](#) (in Spanish).

Enzo Caponetti, "17th package of EU sanctions: EU reaction to Russian invasion of Ukraine (regularly updated)", ESU, 27 May. Available [here](#).

Kolja Brockmann, Lauriane Héau and Giovanna Maletta, "Cloud Labs and Other New Actors in the Biotechnology Ecosystem: Export Control Challenges and Good Practices in Outreach," *EU Non Proliferation and Disarmament Consortium* n. 98, May 2025. Available [here](#).

Giovanna Maletta, Mark Bromley and Kolja Brockmann, "Non-proliferation, nuclear technology and peaceful uses: examining the role and impact of export controls," *EU non-proliferation and disarmament papers* No. 95, April 2025. Available [here](#).

Chaudfontaine Newsletter

on dual-use items trade controls



ISSUE #59
JUNE 2025

Subscribe:
vvella@uliege.be

Kwinten Dewaele, *Between Freedom and Security. A legal analysis of the dual-use dilemma* (Docotoral dissertation KU Leuven). Available in academic libraries across Flanders; forthcoming in a commercial edition (publication date to be confirmed).



STUDIES AND MORE: ARTICLES, REPORTS, LINKS

On 25 June the European Commision published two reports on dual use research and innovation: “Making the most of EU Research and Innovation Investments: rethinking dual use” and “Unlocking the potential of dual-use research and innovation”. Available [here](#).

“National Security Strategy 2025: Security for the British People in a Dangerous World,” UK Government, 24 June 2025. Available [here](#).

“Complex Proliferation Financing and Sanctions Evasion Schemes”, FATF report, 20 June. Available [here](#).

Hannah Kelley, “Dual-Use Technology and U.S. Export Controls. Findings from the CNAS Technology Policy Lab,” CNAS, 15 June. Available [here](#).

Jessica Rankin “Is BIS Changing Direction? What That Means for the Rest of Use,” ECAG, 1 June. Available [here](#).

Andrew James et al., “European research security: threat perspectives and the responses of policy makers and research performing organisations,” Manchester Institute of Innovation Research, 30 May. Available [here](#).

Evžen Wybitul, “Access Controls Will Solve the Dual-Use Dilemma,” (preliminary work, submitted on 14 May 2025, under review.), Cornell University. Available [here](#).

“Deepseek Unmasked: Exposing the CCP's Latest Tool For Spying, Stealing, and Subverting U.S. Export Control Restrictions,” US House Select Committee, 16 April. Available [here](#).

Sebastiaan Bennink et al., “Recent developments in Dutch, French and European Union Export Controls on Advanced Technologies and Military Items,” Bennink Dunin-Wasowicz, 17 April. Available [here](#).

Anh Nguyen, “Export Controls as Innovation Marketing? Sociotechnical Imaginaries in the Ringfencing of Quantum Technologies,” Law Technology and Humans 7(1), April 2025. Available [here](#).

On 4 April, Singapore’s Ministry of Trade and Industry and Singapore Customs published a “Joint Advisory: Export controls on advanced semiconductor and artificial intelligence (AI) technologies.” Available [here](#).



NEWS

On 18 June, Spain’s Tax Agency arrested three individuals in Valencia, accused of smuggling dual-use machine tools to Russia by falsely declaring a third country as the final destination . Available [here](#) (in Spanish).

John Liu, “Taiwan puts companies behind China’s AI ambitions on export control list,” 16 June, CNN. Available [here](#).

Chaudfontaine Newsletter

on dual-use items trade controls



ISSUE #59
JUNE 2025

Subscribe:
vvella@uliege.be

“China affirms rare-earth export controls align with international practices,” Global Times, 5 June. Available [here](#).

Mason Boycott-Owen, “German firm shipped restricted tech to Russia — after EU sanctions kicked in,” 23 May, Politico. Available [here](#).

“China temporarily suspends export controls of dual-use items for 28 US entities following trade talks: MOFCOM,” Global Times, 14 May. Available [here](#).

“EU budget set for defence-related boost under new regulation,” 22 April, European Commission, press release. Available [here](#).

“Trump’s tariffs: Vietnam tightens dual-use export controls,” Tech in Asia, 11 April. Available [here](#).

Paul Amberg and Derk Christiaans, “The Netherlands amends general licenses for dual-use and military items,” Baker McKenzie, 8 April. 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](#).