

Chaudfontaine Newsletter

on dual-use items trade controls



ISSUE #61

December 2025

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LEGAL DEVELOPMENTS: EUROPEAN UNION

Commission

The Delegated Regulation (EU) 2025/2003, which amends Regulation (EU) 2021/821 with regard to the list of dual-use items, came into force on 15 November. Available [here](#).

Council

On 23 October, the EU adopted the 19th package of sanctions against Russia (which include dual-use items related measures). Available [here](#).

On 13 October, the Council announced the decision to prolong the application of individual restrictive measures against the proliferation and use of chemical weapons by another year, until 16 October 2026. Available [here](#).



LEGAL DEVELOPMENTS: INTERNATIONAL

Canada

On 5 November, Canada published the Notice to exporters no 1159, on the movement to and storage of controlled technology in the Cloud, codifying Canada positions on controlled technology and cloud computing. Available [here](#).

China

In November, China announced to impose new export licensing requirements for certain precursor chemicals destined for the United States, Mexico, and Canada. The rule took effect immediately. Available [here](#).

Israel

On 18 November, the Minister of Defense signed an order to repeal the "Encryption Order" (the Control of Commodities and Services (Engagement in Encryption Items) Order, 1974). This order introduced changes to the export of items with encryption and/or decryption capabilities. The repeal will take effect on 21 March 2026. Available (in Hebrew) [here](#).

Japan

On 11 November, the Ministry of Economy, Trade and Industry published the "Cabinet Decision on the Cabinet Order to Partially Amend the Export Trade Control Order". It concerns the revision of the list of export goods, the elimination of overlaps with export controls under other laws, and the addition of exceptional cases that do not require export license. Available [here](#).

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New Zealand

On 30 October, New Zealand introduced new national controls on exports in response to emerging technology. The updated list includes national controls on certain dual use technologies: materials processing; electronics; and computers. Available [here](#).

United Kingdom

On 16 December, the ECJU updated the consolidated list of strategic military and dual-use items that require export authorisation. Available [here](#).

On 16 December, the ECJU published updates on open general export licences (regarding: export of dual-use items to EU member states; technology for dual-use items; export of dual-use items after exhibition; export for repair/replacement under warranty; export after repair/replacement under warranty; dual-use items India). Available [here](#).

On 20 November, the ECJU published updates on legislative changes to export controls (Notice to exporters 2025/30). Available [here](#).

On 7 November, the ECJU published the Export Control (Amendment) (No.2) Regulations 2025 (since December into force). Available [here](#).

On 29 October, the ECJU published the notice advising of the UK arms embargo on Armenia and Azerbaijan which ceased to be in force as of 13 October 2025. Available [here](#).

On 2 October, the ECJU updated the (AUKUS) open general licence which permits, subject to certain conditions, the export of dual-use items or military goods software or technology and trade of military goods, to, between and among Australia, the USA and the UK. Available [here](#).

United States

On 11 December, the BIS imposed a one-year suspension of the interim final rule, "Expansion of End-User Controls to Cover Affiliates of Certain Listed Entities". The suspension is set to end November 9, 2026, absent a future extension. Available [here](#).

On 28 October, the House of Representatives introduced Bill (HR 5853) to strengthen enforcement of US export control laws and increase civil penalties under Export Control Reform Act of 2018. Available [here](#).

On 9 October, the BIS amended the EAR by adding 29 entries (26 entities and 3 addresses) to the Entity List under the destinations of People's Republic of China (China) (19), Turkey (9), and the United Arab Emirates (UAE) (1). Available [here](#).

Wassenaar Arrangement

On 5 December, the Wassenaar Arrangement published the "List of Dual-Use Goods and Technologies and Munitions List". Available [here](#).

The summary of most recent changes to lists as of 4 December is available [here](#).

Zangger Committee

On 21 November, the Zangger Committee published the Consolidated Trigger List, INF/CIRC/209/Rev.6. Available [here](#).

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OFFICIAL POLICY INFORMATION

On 17 December, the European Commission published the FAQ on export-related restrictions for dual-use goods and advance pursuant to Articles 2, 2a and 2b of Council Regulation No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine. Available [here](#).

On 16 December, the UK ECJU updated the statutory guidance on Russia sanctions. Available [here](#).

Wassenaar Arrangement, "Best Practice Guidelines on Internal Compliance Programmes for Dual-Use Goods and Technologies," 5 December. Available [here](#).

Wassenaar Arrangement, "Statement issued by the Plenary Chair on 2025 outcomes of the Wassenaar Arrangement on export controls for conventional arms and dual-use goods and technologies," 4 December. Available [here](#).

On 3 December, the EU published the "Joint Communication to the European Parliament and the Council - Strengthening EU economic security." Available [here](#).

In December, the EU Joint Research Centre has published the 4th edition of the Export Control Handbook for Chemicals, 2025 edition (Authors: Arnes Novau, X., Francescangeli, A. and Sevini, F.). Available [here](#).

U.S.-China Economic and Security Review Commission, "China's Facilitation of Sanctions and Export Control Evasion," 14 November. Available [here](#).

On 13 November, the UK ECJU published the official licensing data for 1 April to 30 June 2025. Available [here](#).

On 5 November, the UK ECJU updated the statutory guidance on Democratic People's Republic of Korea sanctions. Available [here](#).

In November, the US published the 2025 "National Security Strategy of the United States of America". Available [here](#).

In November, New Zealand opened a consultation on proposals to strengthen its new export controls regime. The consultation is open until 16 January. Available [here](#).

"Albania and Montenegro declare Unilateral Adherence to the Australia Group," Australia Group, October. Available [here](#).

In October, the EU Parliament published the briefing "Dual-use export controls as tools of EU economic security - From coordination to a proactive EU approach". Available [here](#).



MEMBERS' WORKS

John P. Caves III, "The Cat's Out of the Bag: Counterproliferation Lessons from the Curious Case of Limbach Engines," Iran Watch, Wisconsin Project on Nuclear Arms Control, 17 December 2025. Available [here](#).

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"The European Studies Unit of the University of Liège announces cooperation with KOSTI," ESU, 17 December. Available [here](#).

S. Bianchi, C. Campalani, V. Vella, Q. Michel and J. M. Monbaliu, "*Nemo censetur ignorare legem*: what research chemists should know about the EU legal framework," Chemical Society Reviews, 11 December. Available [here](#).

Kolja Brockmann and Lauriane Héau, "Use cases for emerging technologies to strengthen export controls on biological items," SIPRI, December. Available [here](#).

Enzo Caponetti, "19th package of EU sanctions: EU reaction to Russian invasion of Ukraine (regularly updated)," ESU, 10 November. Available [here](#).

Jade Guiberteau Ricard, Giovanna Maletta and Benjamin Zala, "The politicization of export controls and its impacts on arms industry supply chains: The case of Australia," SIPRI commentary, 5 November. Available [here](#).

Mark Bromley and Giovanna Maletta, "The militarization of technology: preventing diversion and misuse through export controls," SIPRI, November. Available [here](#).

Elaine Korzak, "Regulating Commercial Spyware Through Export Controls," Lawfare, 10 December. Available [here](#).

Julia Webster, Jing Xu and Jacqueline Rotondi, "Canada issues guidance on controlled technology and cloud computing," Baker McKenzie, 2 December. Available [here](#).

Jayanthi Pandiyan & Joachim Schild, "Between integration and fragmentation: stages, geopolitical drivers and limits of EU integration in export control of dual-use items," Journal of European Public Policy, 1 December. Available [here](#).

Zahir Kazmi, Strengthening UNSCR 1540: Pathways for Nonproliferation and Balanced Development," Arms Control Association, December. Available [here](#).

"Revocation of the (Israeli) encryption order," Shibolet Law Firm, 26 November. Available [here](#).

Vincent Boulain, Jules Palayer and Charles Ovink, "Addressing the Risks that Civilian AI Poses to International Peace and Security - The Role of Responsible Innovation," SIPRI, November. Available [here](#).

"The DPRK's Violation and Evasion of UN Sanctions through Cyber and Information Technology Worker Activities," Multilateral Sanctions Monitoring Team, 22 October. Available [here](#).

"Export Controls and U.S. Trade Policy: Making Sense of the New Terrain," Just Security, 14 October. Available [here](#).



STUDIES AND MORE: ARTICLES, REPORTS, LINKS

Joe Khawam and Tim Schnabel, "AI Model Outputs Demand the Attention of Export Control Agencies," Just Security, 12 December. Available [here](#).

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T. Hasegawa, T. Takanami and K. Nomizo, "Japan Export Control Updates: Reimposed Sanctions Against Iran and Entities Added to End User List," Baker McKenzie, 13 October. Available [here](#).

"19th package of sanctions against Russia: EU targets Russian energy, third-country banks and crypto providers," EU Press Release, 23 October. Available [here](#).

Mark Handley, "Finland – suspended sentence on conviction for dual-use exports to Russia," Duane Morris, 20 October. Available [here](#).



"U.S. Authorities Shut Down Major China-Linked AI Tech Smuggling Network," US Department of Justice (DoJ), 8 December. Available [here](#).

"Commission announces strategic approach to strengthen Europe's economic security," EU Press Release, 3 December. Available [here](#)

"US issues 10 export denial orders following export control convictions," Global Sanctions, 24 November. Available [here](#).

"US authorizes export of advanced American semiconductors to companies in Saudi, UAE," Reuters, 20 November. Available [here](#).

Enzo Caponetti, "Publication of the updated Annex I to Regulation 2021/821 for 2025," ESU, 14 November. Available [here](#).

"Belarusian Citizen Arrested for Illegally Exporting U.S.-Sourced Aviation Components to Russia," US DoJ, 4 November. Available [here](#).

"Ukraine amends export control body regulations," Global Sanctions, 31 October. 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](#).