

# Chaudfontaine Newsletter

on dual-use items trade controls



ISSUE #62  
March 2026

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## CONTENTS

- 01: LEGAL DEVELOPMENTS: EUROPEAN UNION
- 01: LEGAL DEVELOPMENTS: INTERNATIONAL
- 02: OFFICIAL POLICY INFORMATION
- 02: MEMBERS' WORKS
- 02: STUDIES AND MORE: ARTICLES, REPORTS, LINKS
- 03: NEWS
- 04: "OF INTEREST"



## LEGAL DEVELOPMENTS: EUROPEAN UNION

### *Denmark*

On 23 February, Executive Order no. 365 on the control of exports of the dual-use items and technology was adopted (entering into force on 1 April). Available (in Danish) [here](#).

### *Flemish Government, Belgium*

On February 5, the Flemish Government adopted a new control measure for the export of certain dual-use goods to Israel, on the basis of Article 9 of Regulation 2021/821. Available [here](#).



## LEGAL DEVELOPMENTS: INTERNATIONAL

### *China*

On 24 February, MOFCOM announced export controls on 20 Japanese entities, including Mitsubishi. Available [here](#).

On January 6, MOFCOM announced the tightening of controls on dual-use items exports to Japan. Available [here](#).

### *Taiwan*

On 11 February, Taiwan published the Export Control List for Dual Use Items and Technology and Common Military List. Available [here](#).

### *United Kingdom*

On 30 March, the ECJU published the notice regarding the Change to the Open Individual Export Licence (OIEL) amendments process. Available [here](#).

On 5 March, the ECJU published a list of exceptions to the Belarus trade and transport sanctions. Available [here](#).

### *United States*

On 4 February, BIS published a final rule making a conforming change to the EAR to reflect that Cambodia is no longer a Country Group D:5 country. Available [here](#).

On 21 January, the BIS published the rule easing export controls on certain civil Unmanned Aerial Vehicles (UAVs) and related technologies, which needed a license to be exported to most countries. Available [here](#).

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On 15 January, the BIS published the final rule revising its license review policy for exports of certain semiconductors to China and Macau, changing it from a presumption of denial to a case-by-case review. Available [here](#).

On January 12, the House of Representatives passed the Remote Access Security Act; the bill broadens the scope of the U.S. export control system to include remote access of items. (The bill now awaits Senate action). Available [here](#).



## OFFICIAL POLICY INFORMATION

On 20 February, the US Congressional Research Service published an updated briefing titled “The United Arab Emirates (UAE): Issues for U.S. Policy” which also covers controlled exports. Available [here](#).

Ian J. Stewart, “EU trade in dual-use items with conflict-affected regions,” Study requested by the INTA committee, European Parliament, January. Available [here](#).

On 29 January, the UK ECJU published the statistics on export licensing decisions. Available [here](#).



## MEMBERS' WORKS

Christopher J. Watterson and Ana Sánchez Cobaleda, “Trade, Technology, and the Ivory Tower: Mapping Export Control Risks in Higher Education,” (2026), 21, Global Trade and Customs Journal, Issue 3, pp. 160-168. Available [here](#).

Mark Bromley and Kolja Brockmann, “Good practice guide on applying export controls to transfers of commercial cyber intrusion capabilities,” SIPRI, March. Available [here](#).

Miranda Smith, Kolja Brockmann and Mark Bromley, “Preventing biological weapons proliferation. Operational Applications of Emerging Technologies,” SIPRI, March. Available [here](#).

Kolja Brockmann, “Regulating transfers of AI algorithms, training data and models: The potential and limitations of export controls,” SIPRI, 25 March. Available [here](#).

E. Caponetti, V. Vella, M. Chinchilla Adell, Q. Michel (eds.), “A reviewed W3H methodology,” 14th and 15th Chaufontaine Group Meetings, ESU, January. Available [here](#).



## STUDIES AND MORE: ARTICLES, REPORTS, LINKS

“What the Remote Access Security Act Means for Export Controls Compliance Programs,” Latham & Watkins, 20 March. Available [here](#).

Tom Sedzro and Qian Zhou, “China’s Import and Export Licensing Regime in 2026,” China Briefing, 27 February. Available [here](#).

Treston Chandler, “A New Game of Whack-a-Mole: Iran’s Use of High Diversion Risk Addresses,” Iran

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Watch, Wisconsin Project on Nuclear Arms Control, 26 February. Available [here](#).

Lakshmy Ramakrishnan, “Governing Biotechnology’s Dual-Use Security Dilemma,” Observer Research Foundation, 20 February. Available [here](#).

Altynay Junusova, Rebecca Arcesati, Antonia Hmaid, “Orbital geopolitics: China’s dual-use space internet,” MERICS, 11 February. Available [here](#).



“Japan to promote research and development for dual-use technology,” The Japan Times, 28 March. Available [here](#).

Jowi Morales, “Chinese universities performing military research acquired Super Micro servers with sanctioned Nvidia AI chips — public documents reveal purchases were completed in 2025 and 2026 despite US export controls,” Tom’s Hardware, 28 March. Available [here](#).

Tony Rowles, “The Pentagon Wants Dual-Use Innovation. Patent Law Might Punish It,” War On The Rocks, 27 March. Available [here](#).

“US BIS says Congress should increase penalties for export breaches,” Global Sanctions, 27 February. Available [here](#)

“Chinese National and Two U.S. Citizens Charged with Conspiring to Smuggle Artificial Intelligence Technology to China,” US DoJ, 25 March. Available [here](#).

“New Danish export control Executive Order adopted,” Kromann Reumert, 11 March. Available [here](#).

“Personal data as dual-use technology: Privacy professionals face new export controls,” IAPP, 19 February. Available [here](#).

“Two students convicted in Finland for dual-use export breaches,” Global Sanctions, 3 February. Available [here](#).

Scott Wise et al., “China Announces New Export Controls Targeting Japan”, Crowell, 14 January. Available [here](#).

“Applied Materials to Pay \$252 Million Penalty to BIS for Illegally Exporting Semiconductor Manufacturing Equipment,” BIS, 12 February. Available [here](#).

Daniela Turiccki, “Opinion: What the (UK) government’s new approach to sanctions and export controls enforcement means for you,” Chartered Institute of Export & International Trade, 4 February. Available [here](#).

Noah Tan, “The Nexperia Crisis Shows Why Export Controls Need Allied Coordination,” Lawfare, January 27. Available [here](#).

Alisa Yurchenko, “Exclusive: American, European microchips found in Russia’s latest missile-like drone,” The Kyiv Independent, 22 January. Available [here](#).

Anton Shilov, “Congress wants veto power over Trump administration for AI chip exports — new proposed AI

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Overwatch Act would shift ultimate control of high-performance chip exports,” Tom's Hardware, January 22. Available [here](#).

“BIS Imposes Administrative Penalty on Exyte Management GmbH,” Bureau of Industry & Security, 7 January. Available [here](#).

“Israel allowing traders to bring into Gaza ‘dual-use’ items barred from aid organisations,” The Guardian, 1 January. 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](#).



## “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**  
EUNPDC Newsletter (monthly). Available [here](#).

**European Export Control Association for Research Organisations (EECARO)**

Webpage available [here](#).