



INFORMATION NOTE

Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items ⁽¹⁾: Information on measures adopted by Member States

(C/2026/2595)

Articles 6(5), 7(4), 8(6), 9(4), 11(5), 12 (6), 22(2) and 23(1) of Regulation (EU) 2021/821 of the European Parliament and of the Council (hereunder "the Regulation") set out that measures taken by Member States in implementation of the Regulation should be published in the *Official Journal of the European Union*.

Furthermore, the Commission and the Member States have decided to also publish additional information on measures imposed by Member States under Article 4 and Article 5(3) in order to ensure that exporters have access to comprehensive information on the controls applicable throughout the EU.

1. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 4(3) OF THE REGULATION (AUTHORISATION REQUIREMENT ON THE EXPORT OF DUAL-USE ITEMS NOT LISTED IN ANNEX I)

A Member State may, in application of Article 4(3) of the Regulation, extend the application of Article 4(1) to non-listed dual-use items, if the exporter has grounds for suspecting that those items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

Article 4(4) of the Regulation requires Member States which impose an authorisation requirement, in application of Article 4(3), on the export of dual-use items not listed in Annex I, to inform, where appropriate, the other Member States and the Commission. The table below provides an overview of the measures taken by Member States that have been notified to the Commission. The detailed measures as notified to the Commission are set out immediately thereafter.

Member State	Has the Member State adopted national legislation imposing authorisation requirements in application of Article 4(3)?
BELGIUM	Partially YES
BULGARIA	YES
CZECH REPUBLIC	YES
DENMARK	YES
GERMANY	NO
ESTONIA	NO
IRELAND	YES
GREECE	NO
SPAIN	NO
FRANCE	NO
CROATIA	YES
ITALY	YES
CYPRUS	NO

⁽¹⁾ OJ L 206, 11.6.2021, p. 1.

Member State	Has the Member State adopted national legislation imposing authorisation requirements in application of Article 4(3)?
LATVIA	YES
LITHUANIA	YES
LUXEMBOURG	YES
HUNGARY	YES
MALTA	NO
NETHERLANDS	NO
AUSTRIA	YES
POLAND	NO
PORTUGAL	NO
ROMANIA	YES
SLOVENIA	YES
SLOVAKIA	NO
FINLAND	YES
SWEDEN	YES

1.1. Belgium

An export authorisation shall be required, in the Flemish Region and the Walloon Region, for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Article 3, §1, 1°, of the Flemish Government Decree of 19 December 2025 regulating export, transit and transfer of dual-use items and the provision of technical assistance (Belgian Official Gazette of 26 January 2026); Article 4 of the Walloon Government Decree of 6 February 2014 regulating export, transit and transfer of dual-use items and technology (Belgian Official Gazette of 19.02.2014)).

1.2. Bulgaria

An export authorisation for dual-use items shall be required for dual-use items other than those listed in Annex I to Regulation (EU) 2021/821, where the conditions of Art. 4, 5, 9 or 10 are met, to all or some destinations listed in the same Regulation.

(Article 34, par. 1 of the Defence-Related Products and Dual-Use Items and Technologies Export Control Act, (amended - State Gazette No. 41/2024, effective 10.05.2024)).

1.3. Czech Republic

An export authorisation is required for the export of dual-use items not listed in Annex I if the exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Act 594/2004 Coll, as amended; §3.(4)).

1.4. **Denmark**

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Article 2(6) of the Danish Export Control Law).

1.5. **Ireland**

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Control of Exports Act 2023, Section 10 Obligations of exporter under Articles 3, 4, 5, commenced on 23 August 2024.).

1.6. **Croatia**

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Article 5(2) of the Act on Control of dual-use items, OG 83/2023).

1.7. **Italy**

An export authorisation is required for the export of dual-use items not listed in Annex I if the exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Article 9 of Legislative Decree n° 221/2017 of 15 December 2017, in force since 1 February 2018).

1.8. **Latvia**

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Article 5(7) and Article 17(1) of the Law on the Circulation of Strategic Goods of 21 June 2007; Point 31 of the Regulation 657 (20.10.2010) Procedures for Issuing or Refusal to Issue a Licence for Goods of Strategic Significance and Other Documents Related to the Circulation of Goods of Strategic Significance).

1.9. **Lithuania**

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that the dual-use items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

((Government Resolution No. 932 "On the Approval of the Licensing Rules for Export, Import, Transit and Brokering of Strategic Goods and the Rules of Implementation of the Control of Strategic Goods)).

1.10. **Luxembourg**

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Law of 27 June 2018 on export control, Article 45(1)).

1.11. Hungary

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Par. 7. of Government Decree No 13 of 2011 on 'the foreign trade authorisation of dual-use items').

1.12. Austria

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Section 5 of the 2011 First Foreign Trade Regulation (Erste Außenwirtschaftsverordnung 2011), BGBl. II Nr. 343/2011, published on 28 October 2011).

1.13. Romania

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that the dual use items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(article 5(4) of GO 43/2022 on the control regime for operations concerning dual-use items).

1.14. Slovenia

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Article 4(1) of the Act Regulating the Control of Exports of Dual-Use Items (Zakon o nadzoru izvoza blaga z dvojno rabo (Uradni list RS, št. 37/04, 8/10 in 29/23)).

1.15. Finland

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Par. 5(1) of the Act No 500/2024).

1.16. Sweden

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that dual-use items, which they propose to export, are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Section 4 a of the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217)).

2. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 5(3) OF THE REGULATION (AUTHORISATION REQUIREMENT ON THE EXPORT OF CYBER-SURVEILLANCE ITEMS NOT LISTED IN ANNEX I)

A Member State, in application of Article 5(3) of the Regulation, may adopt or maintain national legislation imposing an authorisation requirement on the export of cyber-surveillance items not listed in Annex I if the exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for use in connection with internal repression and/or the commission of serious violations of human rights and international humanitarian law.

The table below provides an overview of the measures taken by Member States that have been notified to the Commission. The detailed measures as notified to the Commission are set out immediately thereafter.

Member State	Has the Member State adopted national legislation imposing authorisation requirements in application of Article 5(3)?
BELGIUM	Partially YES
BULGARIA	YES
CZECH REPUBLIC	NO
DENMARK	YES
GERMANY	NO
ESTONIA	NO
IRELAND	YES
GREECE	NO
SPAIN	NO
FRANCE	NO
CROATIA	YES
ITALY	YES
CYPRUS	NO
LATVIA	NO
LITHUANIA	NO
LUXEMBOURG	NO
HUNGARY	YES
MALTA	NO
NETHERLANDS	NO
AUSTRIA	NO
POLAND	NO
PORTUGAL	NO
ROMANIA	YES
SLOVENIA	YES
SLOVAKIA	NO
FINLAND	NO
SWEDEN	YES

2.1 Belgium

An export authorisation shall be required, in the Flemish Region and the Walloon Region, for the export of cybersurveillance items where an exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 5(1) of the Regulation.

(Article 3, §1, 2°, of the Flemish Government Decree of 19 December 2025 regulating export, transit and transfer of dual-use items and the provision of technical assistance (Belgian Official Gazette of 26 January 2026).

2.2. Bulgaria

An export authorisation for dual-use items shall be required for dual-use items other than those listed in Annex I to Regulation (EU) 2021/821, where the conditions of Art. 4, 5, 9 or 10 are met, to all or some destinations listed in the same Regulation.

(Article 34, par. 1 of the Defence-Related Products and Dual-Use Items and Technologies Export Control Act, (amended - State Gazette No. 41/2024, effective 10.05.2024)).

2.3. Denmark

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that cyber-surveillance items, which they propose to export, are or may be intended for any of the uses referred to in Article 5(1) of the Regulation.

(Article 2(8) of the Danish Export Control Law).

2.4. Ireland

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that cyber-surveillance items, which they propose to export, are or may be intended for any of the uses referred to in Article 5(1) of the Regulation.

(Control of Exports Act 2023, Section 10 Obligations of exporter under Articles 3, 4, 5, commenced on 23 August 2024.)

2.5. Croatia

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that cyber-surveillance items, which they propose to export, are or may be intended for any of the uses referred to in Article 5(1) of the Regulation.

(Article 5(2) of the Act on Control of dual-use items, OG 83/2023).

2.6. Italy

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that cyber-surveillance items, which they propose to export, are or may be intended for any of the uses referred to in Article 5(1) of the Regulation.

(Article 9 of Legislative Decree n° 221/2017 of 15 December 2017, in force since 1 February 2018).

2.7. Romania

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that cyber-surveillance items, which they propose to export, are or may be intended for any of the uses referred to in Article 5(1) of the Regulation.

(Article 5(4) of GO 43/2022 on the control regime for operations concerning dual-use items).

2.8. Hungary

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that cyber-surveillance items, which they propose to export, are or may be intended for any of the uses referred to in Article 5(1) of the Regulation.

(Par. 8. of Government Decree No 13 of 2011 on 'the foreign trade authorisation of dual-use items').

2.9. Slovenia

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that cyber-surveillance items, which they propose to export, are or may be intended for any of the uses referred to in Article 5(1) of the Regulation.

(Article 4(2) of the Act Regulating the Control of Exports of Dual-Use Items (Zakon o nadzoru izvoza blaga z dvojno rabo (Uradni list RS, št. 37/04, 8/10 in 29/23)).

2.10 Sweden

An export authorisation shall be required for the export of non-listed dual-use items where an exporter has grounds for suspecting that cyber-surveillance items, which they propose to export, are or may be intended for any of the uses referred to in Article 5(1) of the Regulation.

(Section 4 a of the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217)).

3. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 6(3) OF THE REGULATION (EXTENSION OF BROKERING CONTROLS)

Article 6(3) in conjunction with Article 6(5) of the Regulation requires the Commission to publish measures taken by Member States to extend the application of Article 6(1) to non-listed dual-use items.

The table below provides an overview of the measures taken by Member States that have been notified to the Commission. The detailed measures as notified to the Commission are set out immediately thereafter.

Member State	Has the application of brokering controls set out in Article 6(1) been extended further to Article 6(3)?
BELGIUM	NO
BULGARIA	YES
CZECH REPUBLIC	YES
DENMARK	NO
GERMANY	NO
ESTONIA	YES
IRELAND	YES
GREECE	YES
SPAIN	YES
FRANCE	NO
CROATIA	YES
ITALY	YES
CYPRUS	NO
LATVIA	YES
LITHUANIA	NO
LUXEMBOURG	YES
HUNGARY	YES
MALTA	NO
NETHERLANDS	YES
AUSTRIA	YES
POLAND	NO

Member State	Has the application of brokering controls set out in Article 6(1) been extended further to Article 6(3)?
PORTUGAL	NO
ROMANIA	NO
SLOVENIA	NO
SLOVAKIA	NO
FINLAND	YES
SWEDEN	YES

3.1. Bulgaria

An authorisation for brokering services in dual-use items is required for dual-use items:

1. specified in Annex I to Regulation (EU) 2021/821, where the items are or may be intended for the uses specified in Article 4(1)(a) and (b) of that Regulation;
2. which are not included in Annex I to Regulation (EU) 2021/821, where the items are or may be intended for the uses specified in Article 4(1) of that Regulation.

(Article 34, par. 5 of the Defence-Related Products and Dual-Use Items and Technologies Export Control Act, (amended - State Gazette No. 41/2024, effective 10.05.2024)).

3.2. Czech Republic

An authorisation shall be required for the brokering of dual-use items if the competent authority informs the broker that dual-use items not listed in Annex I of the Regulation are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1)(a) of the Regulation, or that dual-use items are or may be intended, in their entirety or in part, for military end-uses referred to in Article 4(1)(b) of the Regulation.

(Paragraph 3 of Act No 594/2004 Coll. 'Implementing the European Community Regime for the Control of Exports, Transfer, Brokering, and Transit of Dual-Use Items (as amended)).

3.3. Estonia

An authorisation shall be required for the brokering of dual-use items which have characteristics of strategic goods because of their end-use or end-user, public security or human rights consideration, although they have not been entered in the list of strategic goods.

(Paragraph 6 (7) of the Strategic Good Act).

3.4. Ireland

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation if the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4 (1) of the Regulation.

(Control of Exports Act 2023, Section 14 obligations of broker under Article 6, commenced on 23 August 2024).

3.5. Greece

An authorisation shall be required for the brokering of dual-use items, when the items are or may be intended, in their entirety or in part, for military end-uses and destinations referred to in Article 4(1)(b) of the Regulation.

(Paragraph 3.2.3 of 'Ministerial Decision No 121837/e3/21837/28-9-2009').

3.6. Spain

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation, when the items are or may be intended, in their entirety or in part, for any of the uses and destinations referred to in Article 4(1)(a) and 4(1)(b) of the Regulation.

(Article 2.3.b) of the Royal Decree 679/2014, of 1 August 2014 on the control of external trade in defence material, other material and dual-use goods and technologies).

3.7. Croatia

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation, if the competent authority informs the broker that dual-use items are or may be, in their entirety or in part, intended for any of the uses referred to in Article 4(1)(a) and 4(1)(b) of the Regulation.

(Article 6(2) of the Act on Control of dual-use items, OG 83/2023).

3.8. Italy

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation, when the items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1)(a) or 4(1)(b) of the Regulation.

(Article 9 of Legislative Decree n° 221/2017 of 15 December 2017, in force since 1 February 2018).

3.9. Latvia

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation, when the items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1)(a) or 4(1)(b) of the Regulation.

(Article 5(7) of the Law on the Circulation of Strategic Goods of 21 June 2007; Point 31 of the Regulation 657 (20.10.2010) Procedures for Issuing or Refusal to Issue a Licence for Goods of Strategic Significance and Other Documents Related to the Circulation of Goods of Strategic Significance).

3.10. Luxembourg

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation, when the items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1)(a) of the Regulation, and for military end-uses and destinations as referred to in Article 4(1)(b) of the Regulation.

(Law of 27 June 2018 on export control, Article 42(1)).

3.11. Hungary

An authorisation shall be required for the brokering of dual-use items listed in Annex I of the Regulation, and for dual use items not listed in Annex I of the Regulation, when the items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Par. 17.1 of Government Decree No 13 of 2011 on 'the foreign trade authorisation of dual-use items').

3.12. Netherlands

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation, when the items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1)(a) of the Regulation and for dual-use items, when the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Article 4 Strategic Services Act (Wet Strategische diensten)).

An authorisation shall also be required for the brokering of 37 chemical substances when the destination is Iraq, regardless of the specific consignee or end-user.

(Decree Goods for Dual-Use Iraq - Regeling goederen voor tweërlei gebruik Irak).

An authorisation shall also be required for the brokering of certain dual-use items that can be used in connection with internal repression when the destination is Syria.

(Decree Goods for Dual-Use - Regeling goederen voor tweërlei gebruik).

3.13. Austria

An authorisation shall be required for the brokering of dual-use items if the competent authority notifies the broker that the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Section 15(1) of the Foreign Trade Act (Außenwirtschaftsgesetz 2011, BGBl. I Nr. 26/2011)).

3.14. Finland

An authorisation shall be required for the brokering of dual-use items listed in Annex I of the Regulation, if the broker has been notified by the competent authority that the items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Par. 6(1) of the Act No 500/2024).

3.15. Sweden

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation if the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Section 4 b paragraph one of the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217)).

4. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 6(4) OF THE REGULATION (EXTENSION OF BROKERING CONTROLS)

Article 6(4) in conjunction with Article 6(5) of the Regulation requires the Commission to publish measures taken by Member States imposing an authorisation requirement on the brokering of dual-use items, if the broker has grounds for suspecting that these items are or may be intended for any of the uses referred to in Article 4(1).

The table below provides an overview of the measures taken by Member States and that have been notified to the Commission. The detailed measures as notified to the Commission are set out immediately thereafter.

Member State	Have brokering controls been imposed on the basis of Article 6(4)?
BELGIUM	NO
BULGARIA	YES
CZECH REPUBLIC	YES
DENMARK	NO
GERMANY	NO
ESTONIA	YES
IRELAND	YES
GREECE	YES
SPAIN	YES
FRANCE	NO
CROATIA	YES

Member State	Have brokering controls been imposed on the basis of Article 6(4)?
ITALY	YES
CYPRUS	NO
LATVIA	YES
LITHUANIA	NO
LUXEMBOURG	YES
HUNGARY	YES
MALTA	NO
NETHERLANDS	YES
AUSTRIA	YES
POLAND	NO
PORTUGAL	NO
ROMANIA	YES
SLOVENIA	NO
SLOVAKIA	NO
FINLAND	YES
SWEDEN	YES

4.1. Bulgaria

An authorisation for brokering services with dual-use items, as defined in Annex I to Regulation (EU) 2021/821, shall be required where the broker has been informed by a control authority under Article 67(1) that the items are or may be intended, in whole or in part, for any of the uses specified in Article 4(1)(a) and (b) of Regulation (EU) 2021/821, as well as in cases where the broker has reason to believe that the dual-use items are or may be intended for the uses specified in Article 4(1)(a) and (b) of the same Regulation.

(Article 47, par. 1 of the Defence-Related Products and Dual-Use Items and Technologies Export Control Act, (amended - State Gazette No. 41/2024, effective 10.05.2024)).

4.2. Czech Republic

If a broker has grounds for suspecting that dual-use items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the broker shall notify the competent authority, which may decide to impose an authorisation requirement.

(Par. 3(4) of the Act No 594/2004 Coll. 'Implementing the European Community Regime for the Control of Exports, Transfer, Brokering, and Transit of Dual-Use Items').

4.3. Estonia

If a broker has grounds for suspecting that dual-use items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the broker shall notify the Strategic Goods Commission (SGC), police authorities or security authorities immediately thereof. After such notification, the SGC may decide to impose an authorisation requirement.

(Par. 77 of the Strategic Goods Act).

4.4. Ireland

If a broker has grounds for suspecting that dual-use items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the broker shall notify the competent authority, which may decide to impose an authorisation requirement.

(Control of Exports Act 2023, Section 14 Obligations of a broker under Article 6, commenced on 23 August 2024).

4.5. Greece

An authorisation shall be required for the brokering of dual-use items if the broker has grounds for suspecting that the items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Par. 3.2.2 of the Ministerial Decision No 121837/e3/21837/28-9-2009).

4.6. Spain

If a broker has grounds for suspecting that the dual-use items not listed in Annex I of the Regulation, for which he proposes brokering services, are or may be intended, in their entirety or in part, for any of the uses and destinations referred to in Article 4(1)(a) and 4(1)(b), he must notify the competent authority, which will decide whether or not such brokering services are subject to authorisation.

(Article 2.3.c) of the Royal Decree 679/2014, of 1 August 2014 on the control of external trade in defence material, other material and dual-use goods and technologies).

4.7. Croatia

If a broker has grounds for suspecting that dual-use items not listed in Annex I of the Regulation, are or may be intended for any of the uses referred to in Article 4(1)(a) and 4(1)(b) of the Regulation, the broker shall notify the competent authority, which may decide to impose an authorisation requirement.

(Article 6(3) of the Act on Control of dual-use items, OG 83/2023).

4.8. Italy

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation if the broker has grounds for suspecting that the items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Article 9 of Legislative Decree n° 221/2017 of 15 December 2017, in force since 1 February 2018).

4.9. Latvia

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation if the broker has grounds for suspecting that the items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Article 5(7) and Article 17(1) of the Law on the Circulation of Strategic Goods of 21 June 2007; Point 31 of the Regulation 657 (20.10.2010) Procedures for Issuing or Refusal to Issue a Licence for Goods of Strategic Significance and Other Documents Related to the Circulation of Goods of Strategic Significance).

4.10. Luxembourg

An authorisation shall be required for the brokering of dual-use items not listed in Annex I of the Regulation if the broker has grounds for suspecting that the items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Law of 27 June 2018 on export control, Article 42(2)).

4.11. Hungary

An authorisation shall be required for the brokering of dual-use items if the broker has grounds for suspecting that the items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Par. 17 (2) of Government Decree No 13 of 2011 'on the foreign trade authorisation of dual-use items).

4.12. Netherlands

An authorisation shall be required for the brokering of listed dual-use items when the items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Article 4(5) of the Strategic Services Act (Wet strategische diensten)).

4.13. Austria

If a broker has grounds for suspecting that dual-use items, are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the broker shall notify the competent authority, which may decide to impose an authorisation requirement.

(Section 5 of the 2011 First Foreign Trade Regulation (Erste Außenwirtschaftsverordnung 2011), BGBl. II Nr. 343/2011, published on 28 October 2011).

4.14. Romania

An authorisation shall be required for the brokering of dual-use items if the broker has grounds for suspecting that the items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Article 15(3) of the GO 43/2022 on the control regime for operations concerning dual-use items).

4.15. Finland

If a broker has grounds for suspecting that dual-use items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the broker shall notify the competent authority, which may decide to impose an authorisation requirement.

(Par. 5(2) of the Act No 500/2024).

4.16. Sweden

If a broker has grounds for suspecting that dual-use items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the broker shall notify the competent authority, which may decide to impose an authorisation requirement.

(Section 4 b paragraph two of the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217)).

5. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 7(3) OF THE REGULATION (EXTENSION OF TRANSIT CONTROLS)

Article 7(3) in conjunction with Article 7(4) of the Regulation requires the Commission to publish measures taken by Member States extending the application of Article 7(1) to non-listed dual-use items.

The table below provides an overview of the measures taken by Member States, as notified to the Commission. Details on the measures are provided thereafter.

Member State	Have the transit control provisions set out in Article 7(1) been extended on the basis of Article 7(3)?
BELGIUM	Partially YES
BULGARIA	NO
CZECH REPUBLIC	YES

Member State	Have the transit control provisions set out in Article 7(1) been extended on the basis of Article 7(3)?
DENMARK	NO
GERMANY	NO
ESTONIA	YES
IRELAND	YES
GREECE	YES
SPAIN	YES
FRANCE	YES
CROATIA	YES
ITALY	YES
CYPRUS	NO
LATVIA	YES
LITHUANIA	YES
LUXEMBOURG	YES
HUNGARY	YES
MALTA	NO
NETHERLANDS	YES
AUSTRIA	YES
POLAND	NO
PORTUGAL	NO
ROMANIA	NO
SLOVENIA	NO
SLOVAKIA	NO
FINLAND	YES
SWEDEN	YES

5.1. Belgium

The transit of non-Union non-listed dual-use items may be prohibited by the competent authorities, in the Flemish Region and the Walloon Region, if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authorities, in the Flemish Region and the Walloon Region, if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Article 3, §3, of the Flemish Government Decree of 19 December 2025 regulating export, transit and transfer of dual-use items and the provision of technical assistance (Belgian Official Gazette of 26 January 2026; Article 5 and 6 of the Walloon Government Decree of 6 February 2014 regulating export, transit and transfer of dual-use items and technology (Belgian Official Gazette of 19.02.2014).

5.2. Czech Republic

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Par. 13b of the Act No 594/2004 Coll. 'Implementing the European Community Regime for the Control of Exports, Transfer, Brokering, and Transit of Dual-Use Items' (1)).

5.3. Estonia

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Par. 3, 6 and 7 of the Strategic Goods Act (SGA)).

5.4. Ireland

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Control of Exports Act 2023, Section 18-19, commenced on 23 August 2024).

5.5. Greece

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Par. 3.3.3. of the Ministerial Decision No 121837/e3/21837/28-9-2009).

5.6. Spain

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation

(Article 11 of Act 53/2007 of December 28, on the control of external trade on material of defense and dual use).

5.7. France

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Article 3(l) of Decree n°2020-74 of 31 January 2020, as amended by Decree n°2020-1481 of 30 November 2020).

5.8. Croatia

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Article 8(1) and Article 8(3) of the Act on Control of dual-use items, OG 83/2023).

5.9. Italy

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Article 7 of Legislative Decree n° 221/2017 of 15 December 2017, in force since 1 February 2018).

5.10. Latvia

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Article 5(7) of the Law on the Circulation of Strategic Goods of 21 June 2007; Point 31 of the Regulation 657 (20.10.2010) Procedures for Issuing or Refusal to Issue a Licence for Goods of Strategic Significance and Other Documents Related to the Circulation of Goods of Strategic Significance).

5.11. Lithuania

The transit of non-listed dual-use goods may be prohibited by the competent authority if the items are or may be intended for the uses referred to in Article 4(1) of the Regulation.

(The Law of the Republic of Lithuania on the Control of Strategic Goods No. XIV-1738 December 22, 2022).

5.12. Luxembourg

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Law of 27 June 2018 on export control, Article 43(2)).

These provisions shall not apply to the transit of dual-use goods dispatched without transshipment or change of means of transport (no transshipment or change of conveyance shall be deemed to be the discharge, for the purpose of securing the cargo, of goods in a ship or aircraft, provided that such goods are re-embarked on the same ship or aircraft), and to the transit of dual-use items for which there is already a general export authorization from the European Union.

(Law of 27 June 2018 on export control, Article 43(3)).

5.13. Hungary

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1) of the Regulation.

(Par. 18 of the Government Decree No 13 of 2011 'on foreign trade authorisation of dual-use items').

5.14. The Netherlands

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1)(a) of the Regulation.

The transit of non-Union dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for military end use and destinations referred to in Article 4(1)(b) of the Regulation.

(Article 4a(1) and Article 2 of the Decree for Strategic Goods (Besluit strategische goederen)).

5.15. Austria

The transit of dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1) of the Regulation.

(Section 15 of the 2011 Foreign Trade Act (Außenwirtschaftsgesetz 2011, BGBl. I Nr. 26/2011)).

5.16. Finland

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1) of the Regulation.

(Par. 6(2) of the Act No 500/2024).

5.17. Sweden

The transit of non-Union non-listed dual-use items may be prohibited by the competent authority if the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1) of the Regulation.

(Section 4 c of the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217)).

6. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 8(4) OF THE REGULATION (EXTENSION OF TECHNICAL ASSISTANCE)

Article 8(4) of the Regulation establishes that a Member State may extend the application of an authorisation requirement for the provision of technical assistance related to dual-use items not listed in Annex I if the provider of technical assistance has been informed by the competent authority that the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1).

The table below provides an overview of the measures taken by Member States, as notified to the Commission. Details on the measures are provided thereafter.

Member State	Has the Member State adopted national legislation imposing authorisation requirements in application of Article 8(4)?
BELGIUM	Partially YES
BULGARIA	NO
CZECH REPUBLIC	NO
DENMARK	NO
GERMANY	NO
ESTONIA	NO
IRELAND	YES
GREECE	NO
SPAIN	NO
FRANCE	NO
CROATIA	YES

Member State	Has the Member State adopted national legislation imposing authorisation requirements in application of Article 8(4)?
ITALY	YES
CYPRUS	NO
LATVIA	NO
LITHUANIA	NO
LUXEMBOURG	NO
HUNGARY	YES
MALTA	NO
NETHERLANDS	YES
AUSTRIA	NO
POLAND	NO
PORTUGAL	NO
ROMANIA	NO
SLOVENIA	NO
SLOVAKIA	NO
FINLAND	NO
SWEDEN	YES

6.1. Belgium

An authorisation shall be required, in the Flemish Region, for the provision of technical assistance related to dual use items not listed in Annex I of the Regulation if the provider of technical assistance has been informed by the competent authority that the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Article 3, §2, of the Flemish Government Decree of 19 December 2025 regulating export, transit and transfer of dual-use items and the provision of technical assistance (Belgian Official Gazette of 26 January 2026).

6.2. Ireland

An authorisation shall be required for the provision of technical assistance related to dual use items not listed in Annex I of the Regulation if the provider of technical assistance has been informed by the competent authority that the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Control of Exports Act 2023, Section 16 Obligations of the provider of technical assistance under Article 8, commenced on 23 August 2024).

6.3. Croatia

An authorisation shall be required for the provision of technical assistance related to dual use items not listed in Annex I of the Regulation if the provider of technical assistance has been informed by the competent authority that the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Article 7(2) of the Act on Control of dual-use items, OG 83/2023).

6.4. Italy

An authorisation shall be required for the provision of technical assistance related to dual use items not listed in Annex I of the Regulation if the provider of technical assistance has been informed by the competent authority that the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4 (1) of the Regulation.

(Article 3 and 9 of Legislative Decree 15 December 2017 No 221, as amended by Law 10 August 2023 No 103).

6.5. Hungary

An authorisation shall be required for the provision of technical assistance related to dual use items not listed in Annex I of the Regulation if the provider of technical assistance has been informed by the competent authority that the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1) of the Regulation.

(Par. 20 of the Government Decree No 13 of 2011 ‘on foreign trade authorisation of dual-use items’).

6.6. Netherlands

The provision of technical assistance is prohibited for use in connection with the development, production, handling, operation, maintenance, storage, detection, identification or dissemination of chemical, biological or nuclear weapons or other nuclear explosive devices, or the development, production, maintenance or storage of missiles capable of delivering such weapons.

(Article 3, sub 1, of the Strategic Services Act - Wet Strategische Diensten).

6.7. Sweden

An authorisation shall be required for the provision of technical assistance related to dual use items not listed in Annex I of the Regulation if the provider of technical assistance has been informed by the competent authority that the items in question are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4 (1) of the Regulation.

(Section 4 d paragraph one of the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217)).

7. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 8(5) OF THE REGULATION (TECHNICAL ASSISTANCE)

Pursuant to Article 8(5), a Member State may adopt or maintain national legislation imposing an authorisation requirement on the provision of technical assistance where a provider of technical assistance who proposes to provide technical assistance for dual-use items has grounds for suspecting that those items are or may be intended for any of the uses referred to in Article 4(1).

The table below provides an overview of the measures taken by Member States, as notified to the Commission. Details on the measures are provided thereafter.

Member State	Has the Member State adopted national legislation imposing authorisation requirements in application of Article 8(5)?
BELGIUM	Partially YES
BULGARIA	NO
CZECH REPUBLIC	NO
DENMARK	NO
GERMANY	NO
ESTONIA	NO
IRELAND	YES
GREECE	NO
SPAIN	NO

Member State	Has the Member State adopted national legislation imposing authorisation requirements in application of Article 8(5)?
FRANCE	NO
CROATIA	YES
ITALY	YES
CYPRUS	NO
LATVIA	NO
LITHUANIA	NO
LUXEMBOURG	NO
HUNGARY	YES
MALTA	NO
NETHERLANDS	NO
AUSTRIA	NO
POLAND	NO
PORTUGAL	NO
ROMANIA	NO
SLOVENIA	NO
SLOVAKIA	NO
FINLAND	NO
SWEDEN	YES

7.1. Belgium

If a provider of technical assistance has grounds for suspecting that dual-use items that they propose to provide technical assistance for, are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, an authorisation shall be required in the Flemish Region.

Article 3, §1, 3°, of the Flemish Government Decree of 19 December 2025 regulating export, transit and transfer of dual-use items and the provision of technical assistance (Belgian Official Gazette of 26 January 2026).

7.2. Ireland

If a provider of technical assistance has grounds for suspecting that dual-use items that they propose to provide technical assistance for, are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the provider of technical assistance shall notify the competent authority, which may decide to impose an authorisation requirement.

(Control of Exports Act 2023, Section 16 Obligations of the provider of technical assistance under Article 8, commenced on 23 August 2024).

7.3. Croatia

If a provider of technical assistance has grounds for suspecting that dual-use items that they propose to provide technical assistance for, are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the provider of technical assistance shall notify the competent authority, which may decide to impose an authorisation requirement.

(Article 7(3) of the Act on Control of dual-use items, OG 83/2023).

7.4. Italy

If a provider of technical assistance has grounds for suspecting that dual-use items that they propose to provide technical assistance for, are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the provider of technical assistance shall notify the competent authority, which may decide to impose an authorisation requirement.

(Article 3 and 9 of Legislative Decree 15 December 2017 No 221, as amended by Law 10 August 2023 No 103).

7.5. Hungary

An authorisation shall be required for the provision of technical assistance related to dual use items not listed in Annex I of the Regulation if the provider of technical assistance has grounds for suspecting that the items are or may be intended for any of the uses referred to in Article 4(1) of the Regulation.

(Par. 20 of the Government Decree No 13 of 2011 'on foreign trade authorisation of dual-use items').

7.6. Sweden

If a provider of technical assistance has grounds for suspecting that dual-use items that they propose to provide technical assistance for, are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the provider of technical assistance shall notify the competent authority, which may decide to impose an authorisation requirement.

(Section 4 d paragraph two of the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217)).

8. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 9 OF THE REGULATION (EXTENSION OF CONTROLS TO NON-LISTED ITEMS FOR REASONS OF PUBLIC SECURITY, INCLUDING THE PREVENTION OF ACTS OF TERRORISM, OR FOR HUMAN RIGHTS CONSIDERATIONS)

Article 9(4) of the Regulation requires the Commission to publish measures taken by Member States prohibiting or imposing an authorisation requirement on the export of dual-use items not listed in Annex I for reasons of public security, including the prevention of acts of terrorism, or for human rights considerations.

The table below provides an overview of the measures taken by Member States, as notified to the Commission. Details on the measures are provided thereafter.

Member State	Have additional controls been implemented concerning non-listed goods for reasons of public security, including the prevention of acts of terrorism, or for human rights considerations in application of Article 9(1)?
BELGIUM	NO
BULGARIA	YES
CZECH REPUBLIC	YES
DENMARK	YES
GERMANY	YES
ESTONIA	YES
IRELAND	YES
GREECE	NO
SPAIN	YES
FRANCE	YES
CROATIA	NO
ITALY	YES
CYPRUS	NO

Member State	Have additional controls been implemented concerning non-listed goods for reasons of public security, including the prevention of acts of terrorism, or for human rights considerations in application of Article 9(1)?
LATVIA	YES
LITHUANIA	YES
LUXEMBOURG	YES
HUNGARY	YES
MALTA	NO
NETHERLANDS	YES
AUSTRIA	YES
POLAND	NO
PORTUGAL	NO
ROMANIA	YES
SLOVENIA	YES
SLOVAKIA	NO
FINLAND	YES
SWEDEN	YES

8.1. Bulgaria

The export of dual-use items not listed in Annex I to the Regulation may be subject to a licensing regime or prohibited by an act of the Council of Ministers for reasons of public security or human rights protection.

(Article 34, par. 1 of the Defence-Related Products and Dual-Use Items and Technologies Export Control Act, (amended - State Gazette No. 41/2024, effective 10.05.2024)).

8.2. Czech Republic

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited, by Government Order, for reasons of public security or human rights considerations.

(Par. 3(1)(d) of the Act No 594/2004 Coll).

8.3 Denmark

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited, through an administrative order, for reasons of public security or human rights considerations. This is according to article 1, no. 6, in the consolidated National Act no. 635 of 09/06/2011 with further amendments.

8.4. Germany

a. Section 8 (1) No. 2 of the Foreign Trade and Payments Ordinance (Aussenwirtschaftsverordnung – AWV in connection with Part I Section B of the German Export Control List

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited for reasons of public security or human rights considerations.

(Section 8 (1) No 2 of the Foreign Trade and Payments Ordinance (Aussenwirtschaftsverordnung – AWV) in connection with Part I Section B of the German Export Control List.

The export of dual-use items not listed in Annex I of the Regulation is subject to authorisation if the items are listed in Part I Section B of the German Export Control List.

(Section 8 (1) No 2 of the Foreign Trade and Payments Ordinance (*Außenwirtschaftsverordnung* - AWV)).

Part I Section B of the German Export Control List includes the following items:

- **1E901** “Technology” according to the General Technology Note, other than that specified in 1E001 or 1E101 in Annex I to Regulation (EU) 2021/821 as amended, for the „development“ or „production“ of polymethacrylimide foams, if the destination lies outside the customs territory of the European Union and outside the areas listed in Annex II Part 2 Section A of the Regulation (EU) 2021/821.
- **2B952** Equipment capable of use in handling biological substances, other than that controlled by 2B352 in the framework of Regulation (EU) 2021/821 as amended, if the purchasing country or country of destination is Iran or North Korea:
 - (a) fermenters, capable of cultivation of pathogenic 'micro-organisms' or viruses, or capable of toxin production, without the propagation of aerosols and having a total capacity of 10 l or more;
 - (b) agitators for fermenters controlled by 2B352(a) in the framework of Regulation (EU) 2021/821 as amended.

Technical note:

Fermenters include bioreactors, chemostats and continuous-flow systems.

- **2B993** Equipment for the deposition of metallic overlays for non-electronic substrates as follows, and specially designed components and accessories therefor, if the purchasing country or country of destination is Iran:
 - (a) chemical vapour deposition (CVD) production equipment;
 - (b) electron beam physical vapour deposition (EB-PVD) production equipment;
 - (c) production equipment for deposition by means of inductive or resistance heating.
- **3A1901a15** Complementary Metal Oxide Semiconductor (CMOS) integrated circuits, not specified in 3A001a2 of Annex I of the Regulation (EU) 2021/821 as amended, designed to operate at an ambient temperature equal to or less (better) than 4.5 K (- 268,65 °C), where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821.

Technical Note:

For the purposes of 3A1901a15, CMOS integrated circuits are also referred to as cryogenic CMOS or cryoCMOS.

- **3A1901b13** Parametric signal amplifiers, where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821, having all of the following:
 - (a) Designed for operation at an ambient temperature below 1 K (- 272,15°C);
 - (b) Designed for operation at any frequency from 2 GHz up to and including 15 GHz; and
 - (c) A noise figure less (better) than 0.015 dB at any frequency from 2 GHz up to and including 15 GHz at 1 K (- 272,15°C).

Note: 3A1901b13 includes Travelling Wave Parametric Amplifiers (TWPAs).

Technical Note:

For the purposes of 3A1901b13, parametric signal amplifiers may also be referred to as Quantum Limited Amplifiers (QLAs).

- **3A1904** Cryogenic cooling systems and components, where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821, as follows:
 - (a) Systems rated to provide a cooling power greater than or equal to 600 μ W at or below a temperature of 0.1 K (- 273,05°C) for a period of greater than 48 hours;
 - (b) Two-stage pulse tube cryocoolers rated to maintain a temperature below 4 K (- 269,15°C) and provide a cooling power greater than or equal to 1.5 W at or below a temperature of 4.2 K (- 268,95°C).
- **3B1901k** Equipment designed for dry etching, where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821 having any of the following:
 - (a) Equipment designed or modified for isotropic dry etching, having a largest ‘silicon germanium-to-silicon (SiGe:Si) etch selectivity’ of greater than or equal to 100:1; or
 - (b) Equipment designed or modified for anisotropic dry etching, having all of the following:
 1. Radio Frequency (RF) power source(s) with at least one pulsed RF output;
 2. One or more fast gas switching valve(s) with switching time less than 300 ms; and
 3. Electrostatic chuck with 20 or more individually controllable variable temperature elements.

Note 1: 3B1901k includes etching by ‘radicals’, ions, sequential reactions, or non-sequential reaction.

Note 2: 3B1901k includes etching:

- a) Using RF pulse excited plasma,*
- b) Using pulsed duty cycle excited plasma,*
- c) Using pulsed voltage on electrodes modified plasma,*
- d) Cyclic injection and purging of gases combined with a plasma,*
- e) Plasma atomic layer etching or*
- f) Plasma quasi-atomic layer etching.*

Technical Note:

1. *For the purposes of 3B1901k ‘silicon germanium-to-silicon (SiGe:Si) etch selectivity’ is measured for a Ge concentration of greater than or equal to 30% (Si 0.70 Ge 0.30).*
 2. *For the purposes of 3B1901k ‘radical’ is defined as an atom, molecule, or ion that has an unpaired electron in an open electron shell configuration.*
- **3B1903** Scanning Electron Microscope (SEM), equipment designed for imaging semiconductor devices or integrated circuits, where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821, having all of the following:
 - (a) Stage placement accuracy less (better) than 30 nm;
 - (b) Stage positioning measurement performed using laser interferometry;
 - (c) Position calibration within a Field-Of-View (FOV) based on laser interferometer length-scale measurement;
 - (d) Collects and stores images having more than 200 000 000 pixels;
 - (e) FOV overlap of less than 5% in vertical and horizontal directions;
 - (f) Stitching overlap of FOV less than 50 nm, and
 - (g) Accelerating voltage more than 21 kV.

Note: 3B1903 includes SEM equipment designed for chip design recovery

- **3B1904** Cryogenic wafer probing equipment, where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821, having all of the following:
 - (a) Designed to test devices at temperatures less than or equal to 4.5 K (- 268,65°C); And
 - (b) Designed to accommodate wafer diameters greater than or equal to 100 mm.
- **3D1902** "Software", specially designed for the „use“ of equipment specified in 3B1901k
- **3D1907** "Software" designed to extract “GDSII” or equivalent standard layout data and perform layer-to-layer alignment from Scanning Electron Microscope (SEM) images, and generate multi-layer “GDSII” data or the circuit netlist
- **3E1901** "Technology" according to the General Technology Note for the "development" or "production" of equipment specified in 3A1901b13, 3A1904, 3B1901k, 3B1903 or 3B1904, where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821.
- **3E1902** "Technology" other than that specified in 3E001 of Annex I to Regulation (EU) 2021/821, as amended, according to the General Technology Note for the "development" or "production" of equipment specified in 3A1901a15, where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821

Note 1: 3E1902 includes 'process recipes'.

Note 2: 3E1902 does not apply to 'Process Design Kits' (PDKs), unless they include libraries implementing functions or technologies for items specified by 3A001 of Annex I of the Regulation (EU) 2021/821 as amended.

Technical Note 1:

A 'process recipe' is a set of conditions and parameters for a particular process step.

Technical Note 2:

A 'Process Design Kit' (PDK) is a software tool provided by a semiconductor manufacturer to ensure that the required design practices and rules are taken into account in order to successfully produce a specific integrated circuit design in a specific semiconductor process in accordance with technological and manufacturing constraints (each semiconductor manufacturing process has its particular 'PDK')

- **3E1905** "Technology" according to the General Technology Note for the "development" or "production" of integrated circuits or devices using "Gate all-around Field-Effect Transistor" ("GAAFET") structures, where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821

Note 1: 3E1905 includes 'process recipes'.

Note 2: 3E1905 does not apply for tool qualification or maintenance.

Note 3: 3E1905 does not apply to Process Design Kits' (PDKs), unless they include libraries implementing functions or technologies for items specified by 3A001 of Annex I of the Regulation (EU) 2021/821 as amended.

Technical Note 1:

A 'process recipe' is a set of conditions and parameters for a particular process step.

Technical Note 2:

A 'Process Design Kit' ('PDK') is a software tool provided by a semiconductor manufacturer to ensure that the required design practices and rules are taken into account in order to successfully produce a specific integrated circuit design in a specific semiconductor process, in accordance with technological and manufacturing constraints (each semiconductor manufacturing process has its particular 'PDK').

— **4A1906** Quantum computers and related "electronic assemblies" and components therefor, where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821, as follows:

(a) Quantum computers as follows:

1. supporting 34 or more, but fewer than 100, 'fully controlled', 'connected' and 'working' 'physical qubits', and having a 'C-NOT error' of less than or equal to 10^{-4} ;
2. supporting 100 or more, but fewer than 200, 'fully controlled', 'connected' and 'working' 'physical qubits', and having a 'C-NOT error' of less than or equal to 10^{-3} ;
3. supporting 200 or more, but fewer than 350, 'fully controlled', 'connected' and 'working' 'physical qubits', and having a 'C-NOT error' of less than or equal to 2×10^{-3} ;
4. supporting 350 or more, but fewer than 500, 'fully controlled', 'connected' and 'working' 'physical qubits', and having a 'C-NOT error' of less than or equal to 3×10^{-3} ;
5. supporting 500 or more, but fewer than 700, 'fully controlled', 'connected' and 'working' 'physical qubits', and having a 'C-NOT error' of less than or equal to 4×10^{-3} ;
6. supporting 700 or more, but fewer than 1 100, 'fully controlled', 'connected' and 'working' 'physical qubits', and having a 'C-NOT error' of less than or equal to 5×10^{-3} ;
7. supporting 1 100 or more, but fewer than 2 000, 'fully controlled', 'connected' and 'working' 'physical qubits', and having a 'C-NOT error' of less than or equal to 6×10^{-3} ;
8. supporting 2 000 or more 'fully controlled', 'connected' and 'working' 'physical qubits';

(b) Qubit devices and qubit circuits, containing or supporting arrays of 'physical qubits', and specially designed for items specified by 4A1906a;

(c) Quantum control components and quantum measurement devices, specially designed for items specified by 4A1906a;

Notes:

1. 4A1906 applies to circuit model (or gate-based) and one-way (or measurement-based) quantum computers. This entry does not apply to adiabatic (or annealing) quantum computers.
2. Items specified by 4A1906 may not necessarily physically contain any qubits. For example, quantum computers based on photonic schemes do not permanently contain a physical item that can be identified as a qubit. Instead, the photonic qubits are generated while the computer is operating and then later discarded.
3. Items specified by 4A1906b include semiconductor, superconducting, and photonic qubit chips and chip arrays; surface ion trap arrays; other qubit confinement technologies; and coherent interconnects between such items.
4. 4A1906 applies to items designed for calibrating, initializing, manipulating or measuring the resident qubits of a quantum computer.

Technical Note:

For the purposes of 4A1906:

1. A 'physical qubit' is a two-level quantum system used to represent the elementary unit of quantum logic by means of manipulations and measurements that are not error corrected. 'Physical qubits' are distinguished from logical qubits, in that logical qubits are error-corrected qubits comprised of many 'physical qubits'.
 2. 'Fully controlled' means the 'physical qubit' can be calibrated, initialised, gated, and read out, as necessary.
 3. 'Connected' means that two-qubit gate operations can be performed between any arbitrary pair of the available 'working' 'physical qubits'. This does not necessarily entail all-to-all connectivity.
 4. 'Working' means that the 'physical qubit' performs universal quantum computational work according to the system specifications for qubit operational fidelity.
 5. Supporting 34 or more 'fully controlled', 'connected', 'working' 'physical qubits' refers to the capability of a quantum computer to confine, control, measure and process the quantum information embodied in 34 or more 'physical qubits'.
 6. 'C-NOT error' is the average physical gate error for the nearest-neighbour two- 'physical qubit' Controlled-NOT (C-NOT) gates.
- **4D1901b3** "Software" other than that specified in 4D001 of Annex I to Regulation (EU) 2021/821, as amended, specially designed or modified for the "development" or "production" of equipment specified in 4A1906.b. or 4A1906.c., where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821.
 - **4E1901b3** "Technology" other than that specified in 4E001 of Annex I to Regulation (EU) 2021/821, as amended, according to the General Technology Note, for the "development" or "production" of equipment specified in 4A1906.b. or 4A1906.c., where the destination is outside the customs territory of the European Union and outside the territories listed in Part 2 of Section A of Annex II to Regulation (EU) 2021/821.
 - **5A902** Surveillance systems, equipment and components for ICT (Information and Communication Technology) for public networks, not specified by item 5D001(e) of Annex I to Regulation (EU) 2021/821 as amended, where the destination lies outside the customs territory of the European Union and outside the areas listed in Annex II Section A Part 2 of Regulation (EU) 2021/821, as follows:
 - (a) Monitoring centres (Law Enforcement Monitoring Facilities) for Lawful Interception Systems (LI, for example according to ETSI ES 201 158, ETSI ES 201 671 or equivalent standards, specifications or standards) and specially designed components therefor,
 - (b) Retention systems or devices for call data (Intercept Related Information IRI, for example, according to ETSI TS 102 656 or equivalent standards, specifications or standards) and specially designed components therefor.

Technical note:

Call data includes signalling information, origin and destination (e.g. phone numbers, IP or MAC addresses, etc.), date and time and geographical origin of communication.

Note:

5A902 does not control systems, or devices that are specially designed for any the following purposes:

- (a) billing
- (b) data collection functions within network elements (e.g., Exchange or HLR)
- (c) quality of service of the network (Quality of Service - QoS) or
- (d) user satisfaction (Quality of Experience - QoE)
- (e) operation at telecommunications companies (service providers).

- **5A911** Base stations for digital 'trunked radio' if the purchasing country or country of destination is Sudan or South Sudan.

Technical note:

Trunked radio' is a cellular radio communications procedure with mobile subscribers who are assigned frequency trunks for communication. Digital 'trunked radio' (e.g. TETRA, terrestrial trunked radio) uses digital modulation.

- **5D902** 'Software', not specified by item 5D001(e) of Annex I to Regulation (EU) 2021/821 as amended, where the destination lies outside the customs territory of the European Union and outside the areas listed in Annex II Section A Part 2 of Regulation (EU) 2021/821, as follows:
 - (a) 'software' specifically designed or modified for the 'development', 'production' or 'use' of installations, functions or performance parameters controlled by entry 5A902;
 - (b) 'software' specifically designed or modified for the achievement of characteristics, functions or performance parameters controlled by entry 5A902.
- **5D911** 'Software' specially designed or modified for the 'use' of equipment, which is controlled by item 5A911, if the purchasing country or country of destination is Sudan or South Sudan.
- **5E902** 'Technology' not specified by item 5E001(a) of Annex I to Regulation (EU) 2021/821 as amended, according to the General Technology Note for the 'development', 'production' and 'use' of installations, functions or performance characteristics controlled by entry 5A902, or 'software' controlled by entry 5D902, where the destination lies outside the customs territory of the European Union and outside the areas listed in Annex II Section A Part 2 of Regulation (EU) 2021/821.
- **6A908** Radar-based navigation or surveillance systems for vessel or airborne traffic control, not controlled by items 6A008 or 6A108 in the framework of Regulation (EU) 2021/821 as amended, and specially designed components therefor, if the purchasing country or country of destination is Iran.
- **6D908** 'Software', specially developed or modified for the 'development', 'production' or 'use' of the equipment controlled by 6A908, if the purchasing country or country of destination is Iran.
- **9A904** "Spacecraft" and other equipment, as follows:
 - (a) Antennas designed for use in connection with "spacecrafts", if the destination is outside the customs territory of the European Union and outside the areas listed in Annex II Section A Part 2 of Regulation (EU) 2021/821.
 - (b) 'Laser' communication terminals (LCTs, 'laser' data communication stations), other than those specified in 9A004 of Annex I to Regulation (EU) 2021/821, as amended, for use in connection with "spacecrafts", if the destination is outside the customs territory of the European Union and outside the areas listed in Annex II Section A Part 2 of Regulation (EU) 2021/821.

Technical Note:

9A904 includes items used in the following contexts with "spacecraft", both on the ground and on "spacecraft":

1. Use as a payload for uplink or downlink,
2. Communications between "spacecraft"; or
3. Use in connection with the transmission of telemetry signals.

- **9A991** Ground vehicles not covered by Part I A of the Export Control List, as follows:
 - (a) flatbed trailers and semitrailers with a payload exceeding 25 000 kg and less than 70 000 kg, or having one or more military features and being capable of transporting vehicles controlled by 0006 in Part I A as well as traction vehicles capable of their transportation and having one or more military features if the purchasing country or country of destination is Iran, Libya, Myanmar, North Korea, Pakistan or Somalia;

Note:

Traction vehicles within the meaning of 9A991a comprise all vehicles with primary traction function;

- (b) other trucks and off-road vehicles having one or more military features, if the purchasing country or country of destination is Iran, Libya, Myanmar, North Korea or Somalia.

Note 1: *Military features as defined by 9A991 include:*

- (a) *fording capability of 1,2 m or more;*
- (b) *mountings for guns and weapons;*
- (c) *mountings for camouflage netting;*
- (d) *roof lights, round with sliding or swinging cover;*
- (e) *military enamelling;*
- (f) *hook coupling for trailers in conjunction with a so-called NATO-socket.*

Note 2: *9A991 does not control ground vehicles when accompanying their users for their own personal use.*

- **9A992** Trucks, as follows:
 - (a) all-wheel-drive trucks with a payload exceeding 1 000 kg, if the purchasing country or country of destination is North Korea;
 - (b) trucks with three or more axles and a maximum permissible gross laden weight of more than 20 000 kg, if the purchasing country or country of destination is Iran.
- **9A993** Helicopters, helicopter power transfer systems, gas turbine engines and auxiliary power units (APUs) for use in helicopters, and specially designed components therefor, if the purchasing country or country of destination is Cuba, Iran, Libya, Myanmar, North Korea or Somalia.
- **9A994** Air-cooled power units (aero-engines) with a cubic capacity of 100 cm³ or more and 600 cm³ or less, capable of use in unmanned 'air vehicles', and specially designed components therefor, if the purchasing country or country of destination is Iran.
- **9D904** 'Software' specially designed or modified for the 'development', 'production' or 'use' of items specified in 9A904, if the destination is outside the customs territory of the European Union and outside the areas listed in Annex II Section A Part 2 of Regulation (EU) 2021/821.
- **9E904** 'Technology' according to the General Technology Note, other than that specified in 5E001.b.2., 9E001 and 9E002 of Annex I to Regulation (EU) 2021/821, as amended, for the "development", "production" or "use" of items specified in 9A904 or 'software' specified in 9D904, if the destination is outside the customs territory of the European Union and outside the areas listed in Annex II Section A Part 2 of Regulation (EU) 2021/821.
- **9E991** 'Technology' according to the General Technology Note for the 'development' or 'production' of equipment controlled by 9A993, if the purchasing country or country of destination is Cuba, Iran, Libya, Myanmar or North Korea.
- **9E992** 'Technology' according to the General Technology Note, other than controlled by 9E101(b) in the framework of Regulation (EU) 2021/821 as amended, for the 'production' of 'unmanned aerial vehicles' ('UAVs'), if the destination is outside the customs territory of the European Union and outside the areas listed in Annex II Section A Part 2 of Regulation (EU) 2021/821.

b. **Section 9 Foreign Trade and Payments Ordinance (Aussenwirtschaftsverordnung - AWV)**

An authorisation shall be required for the export of dual-use items not listed in Annex I, if the exporter has been informed by BAFA that the items in question are or may be intended, in their entirety or in part, for the construction or operation of a nuclear installation within the meaning of Category 0 of Annex I to Regulation (EU) 2021/821 or for incorporation into such an installation, and if the country of destination is Algeria, Iraq, Iran, Israel, Jordan, Libya, the Democratic People's Republic of Korea, Pakistan or Syria. If an exporter is aware that the items are intended, in their entirety or in part, for the aforementioned use, he must notify BAFA. BAFA will decide whether or not it makes the export concerned subject to authorisation. This Section shall not apply in the field regulated by Article 4 and Article 10 of Regulation (EU) 2021/821.

(Section 9 of the Foreign Trade and Payments Ordinance (Aussenwirtschaftsverordnung - AWV)).

c. **Section 6 Foreign Trade and Payments Act (Aussenwirtschaftsgesetz - AWG)**

Under Section 6 of the Foreign Trade and Payments Act (Aussenwirtschaftsgesetz - AWG), transactions, legal transactions and actions can be restricted, or obligations to act can be imposed by administrative act, in order to avert a danger pertaining in an individual case to the interests e.g. the essential security interests of the Federal Republic of Germany, the peaceful coexistence of nations, the foreign relations of the Federal Republic of Germany, the public order or security of the Federal Republic of Germany.

8.5. **Estonia**

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited, by decision of the Strategic Goods Commission, for reasons of public security or human rights considerations.

(Par. 2 (11) and 6 (2) of the Strategic Goods Act).

8.6. **Ireland**

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited for reasons of public security or human rights considerations.

(Control of Exports Act 2023, Section 12 Order of the Minister prohibiting the export of dual use items not listed in Annex I and Section 13 Direction that authorisation required to export dual use item not listed in Annex I, commenced 23 August 2024).

8.7. **Spain**

The export of dual-use items not listed in Annex I of the Regulation and listed in Annex III.4 and Annex III.5 of the Royal Decree 679/2014 of 1 August 2014, shall be subject to authorisation.

(Art. 2(3)(a) - Royal Decree 679/2014, of 1 August 2014 on the control of external trade in defence material, other material and dual-use goods and technologies)

— **1C901** ammonium nitrate (CAS 6484-52-2) in an explosive degree with a concentration of nitrogen of 31.5 % or more.

Note 1: Article 1C901 controls ammonium nitrate, technical ammonium nitrate, granulated ammonium nitrate, porous ammonium nitrate and any other presentation in which it can be used as a solid oxidiser.

Note 2: Article 1C901 includes explosive mixtures of ammonium nitrate with fuel oils, emulsions, hydrogels and water resistant explosives.

Note 3: Article 1C901 does not control ammonium nitrate in high density and low porosity fertiliser.

Note 4: Article 1C901 does not control the issue of ammonium nitrate (UN 1942 and UN 2426) for the manufacture of explosives, as well as the matrices of emulsions, suspensions and gels based on ammonium nitrate (UN 3375) used for the manufacture of explosives, which shall be governed by Supplementary Technical Instruction No 30 of the Explosives Regulation, approved by Royal Decree 130/2017 of 24 February.

- **5A901** radio frequency systems and equipment not specified in 5.A.1.f and 5.A.1.h, components and accessories, specially designed or modified to develop any of the following functions:
 1. Take control and command of unmanned aeroplanes.
 2. Deliberately and selectively interfere, deny, inhibit, degrade or deceive radio frequency signals for the control and command of unmanned aeroplanes.
 3. Use the specific characteristics of the radio frequency protocol used by unmanned aeroplanes to interfere with their operation.

N.B. For GNSS disturbance systems, see also Military Goods Controls, Category 11.b.

- **5A902** surveillance systems, equipment and components for public information and communication networks, not specified in Article 5A001 of Annex I to Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021, designed for any of the following functions:
 1. Monitoring for legal interception applications (according to legal interception and telecommunications security requirements for ETSI ES 201 158 network functions, handover interface for lawful interception of telecommunications traffic ETSI ES 201 671 or equivalent standards and specifications) and specially designed components therefor.
 2. Call data retention (in accordance with the requirements for lawful data interception by law enforcement agencies for the handling of ETSI TS 102 656 data or equivalent standards and specifications) and specially designed components therefor.

Technical note: Call data includes signalling information, origin and destination (e.g. phone numbers, IP or MAC addresses, etc.), date and time and geographical origin of communication.

Note: Article 5A902 does not control systems, equipment or components specially designed for any of the following purposes:

- (a) Invoicing;
 - (b) Data collection functions within the network elements;
 - (c) Quality of service of the network; or
 - (d) User satisfaction.
- **5D902** software not specified in Article 5D001 of Annex I to Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 specially designed or modified for the development, production, use, functional configuration and performance control of surveillance systems, equipment and components specified in 5A902

8.8. France

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited for reasons of public security or human rights considerations. (Decree No 2010-292).

National controls on exports of dual-use items have been adopted, as set out in following orders: Ministerial Order of 31 July 2014 concerning the export of certain helicopters and their spare parts to third countries (Published in the French Official Gazette of 8 August 2014); Ministerial Order of 31 July 2014 on the export of tear gas and riot control agents to third countries (Published in the French Official Gazette of 8 August 2014); Ministerial Order of 2 February 2024 (modified by Ministerial Order of 27 March 2025) relating to goods and technologies associated to quantum computers and their enabling technologies and equipment for the design, development, production, testing and inspection of advanced electronic components (Published in the French Official Gazette of 10 February 2024 and 30 March 2025 – ECOI2506508A).

8.9. Italy

The export of dual-use items not listed in Annex I of the Regulation shall be subject to authorisation when their final destination is the Republic of Armenia, the Islamic Republic of Iran, the Republic of Kazakhstan or the Republic of Kirghizstan, and for the following items:

- a) Spark-ignition reciprocating or rotary internal combustion piston engines, usable in the aviation sector. "Aviation sector" means: aircrafts, unmanned aerial vehicles (the so-called UAVs), helicopters, gyroplanes, hybrid airplanes or radio-controlled models;
- b) Parts suitable for the use solely or principally with the engines referred to in letter a).

(Decree of 10 July 2023, Italy's OJ-General Series no. 165, 17 July 2023, page 14).

8.10. Latvia

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited by the Control Committee for Strategic Goods for reasons of public security or human rights considerations.

National list of items not listed in Annex I of Regulation is in force.

- **10A901** Weapons using non-centre fire cased ammunition (rimfire), specially designed components and ammunition.
- **10A902** Aircraft related equipment, spare parts and components. Control applicable only to aircraft equipment, spare parts and components what can be used for both- civil and military aircrafts.
- **10A903** Air guns with energy exceeding 12 J.
- **10A906** Night vision weapon sights and components.
- **10A907** Anti-personnel mines.
- **10D901** Software developed for intelligence services and specially designed to covertly extract, destroy or change information from computers, networks or other information systems.
- **10E902** Military assistance and technical assistance related to military goods.

(Regulation No 645 of 25 September 2007 - 'Regulation on the National List of Strategic Goods and Services', Article 3(1) of the Law on the Circulation of Strategic Goods of 21 June 2007).

8.11. Lithuania

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited for reasons of public security, including the prevention of acts of terrorism, or human rights considerations.

(The Law of the Republic of Lithuania on the Control of Strategic Goods No. XIV-1738, December 22, 2022).

The export of a list of dual-use items not included in Annex I is prohibited when exported through the state road border crossing points of the Republic of Lithuania with non-EU countries.

(Government Resolution No 512 of 28 June 2023, On the Application of National Control Measures Pursuant to Article 9 of Regulation (EU) 2021/821 of the European Parliament and Council, as amended by Resolution No. 888 of 15 November 2023).

National list of controlled dual-use items:

Combined Nomenclature (CN) code	Description:
3818	Chemical elements doped for use in electronics, in the form of discs, wafers or similar forms; chemical compounds doped for use in electronics
3824	Prepared binders for foundry moulds or cores; chemical products and preparations of the chemical or allied industries (including those consisting of mixtures of natural products), not elsewhere specified or included
6909	Ceramic wares for laboratory, chemical or other technical uses; ceramic troughs, tubs and similar receptacles of a kind used in agriculture; ceramic pots, jars and similar articles of a kind used for the conveyance or packing of goods
8420 10 81	Roll laminators of a kind used solely or principally for the manufacture of printed circuit substrates or printed circuits
8421 21	Filtering or purifying machinery and apparatus for liquids, for filtering or purifying water
8421 39	Filtering or purifying machinery and apparatus for gases, excluding intake air filters for internal combustion engines and excluding catalytic converters and other particulate filters, whether or not combined, for purifying or filtering exhaust gases from internal combustion engines
8421 99	Parts of machinery and apparatus for filtering or purifying liquids or gases
8424 89 40	Mechanical appliances for projecting, dispersing, or spraying of a kind used solely or principally for the manufacture of printed circuits or printed circuit assemblies
8456 11 10	Machine tools for working any material by removal of material, operated by laser, for use solely or principally for the manufacture of printed circuits, printed circuit assemblies, parts of heading 8517, or parts of automatic data processing machines
8456 12 10	Machine tools for working any material by removal of material, operated by light or photon beam processes other than laser radiation, for use solely or principally for the manufacture of printed circuits, printed circuit assemblies, parts of heading 8517, or parts of automatic data processing machines
8457	Machining centres, unit construction machines (single station) and multi-station transfer machines, for working metal
8458	Lathes (including turning centres) for removing metal
8459	Machine tools (including way-type unit head machines) for drilling, boring, milling, threading or tapping by removing metal, other than lathes (including turning centres) of heading 8458.
8466	Parts and accessories suitable for use solely or principally with the machines of headings 8456 to 8465, including work or tool holders, self-opening dieheads, dividing heads and other special attachments for the machines; tool holders for any type of tool for working in the hand.
8471	Automatic data-processing machines and units thereof; magnetic or optical readers, machines for transcribing data onto data media in coded form and machines for processing such data, not elsewhere specified
8473	Parts and accessories (other than covers, carrying cases and the like) suitable for use solely or principally with machines of headings 8470 to 8472

Combined Nomenclature (CN) code	Description:
8479 89 70	Automated electronic component placement machines of a kind used solely or principally for the manufacture of printed circuit assemblies
8481 10	Pressure-reducing valves
8481 30	Check (non-return) valves
8481 80	Taps, cocks, valves and similar appliances for pipes, boiler shells, tanks, vats or the like, including pressure-reducing valves and thermostatically controlled valves; excluding pressure-reducing valves, valves for oleohydraulic or pneumatic transmissions, check (non-return) valves and safety or relief valves
8482	Ball or roller bearings
8485	Machines for additive manufacturing
8486	Machines and apparatus of a kind used solely or principally for the manufacture of semiconductor boules or wafers, semiconductor devices, electronic integrated circuits or flat panel displays; machines and apparatus specified in Note 11(C) to chapter 84; parts and accessories
8501	Electric motors and generators (excluding generating sets)
8504	Electrical transformers, static converters (for example, rectifiers) and inductors
8505	Electromagnets; permanent magnets and articles intended to become permanent magnets after magnetisation; electromagnetic or permanent magnet chucks, clamps and similar holding devices; electromagnetic couplings, clutches and brakes; electromagnetic lifting heads
8506 10	Manganese dioxide primary cells and primary batteries
8506 50	Lithium primary cells and primary batteries.
8507	Electric accumulators, including separators therefor, whether or not rectangular (including square)
8517	Telephone sets, including smartphones and other telephones for cellular networks or for other wireless networks; other apparatus for the transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless network (such as a local or wide area network), other than transmission or reception apparatus of heading 8443, 8525, 8527 or 8528
8518 10	Microphones and stands therefor
8523 49	Optical media; other
8523 80	Semiconductor media; other.
8524	Flat panel display modules, whether or not incorporating touch-sensitive screens
8525	Transmission apparatus for radio-broadcasting or television, whether or not incorporating reception apparatus or sound recording or reproducing apparatus; television cameras, digital cameras and video camera recorders
8526	Radar apparatus, radio navigational aid apparatus and radio remote control apparatus
8528	Monitors and projectors, not incorporating television reception apparatus; reception apparatus for television, whether or not incorporating radio-broadcast receivers or sound or video recording or reproducing apparatus
8532	Electrical capacitors, fixed, variable or adjustable (pre-set)

Combined Nomenclature (CN) code	Description:
8533	Electrical resistors (including rheostats and potentiometers), other than heating resistors
8534	Printed circuits
8535	Electrical apparatus for switching or protecting electrical circuits, or for making connections to or in electrical circuits (for example, switches, fuses, lightning arresters, voltage limiters, surge suppressors, plugs and other connectors, junction boxes), for a voltage exceeding 1 000 V
8536	Electrical apparatus for switching or protecting electrical circuits, or for making connections to or in electrical circuits (for example, switches, relays, fuses, surge suppressors, plugs, sockets, lamp holders, junction boxes), for a voltage not exceeding 1 000 V; connectors for optical fibres, optical fibre bundles or cables
8537	Boards, panels, consoles, desks, cabinets and other bases, equipped with two or more apparatus of heading 8535 or 8536, for electric control or the distribution of electricity, including those incorporating instruments or apparatus of Chapter 90, and numerical control apparatus, other than switching apparatus of heading 8517
8538	Parts suitable for use solely or principally with the apparatus of heading 8535, 8536 or 8537
8541	Semiconductor devices (for example, diodes, transistors, semiconductor-based transducers); photosensitive semiconductor devices, including photo-voltaic cells whether or not assembled in modules or made up into panels; light-emitting diodes (LED), whether or not assembled with other light-emitting diodes (LED); mounted piezoelectric crystals
8542	Electronic integrated circuits
8543	Electrical machines and apparatus, having individual functions, not specified or included elsewhere in chapter 85
8544	Insulated (including enamelled or anodised) wire, cable (including coaxial cable) and other insulated electric conductors, whether or not fitted with connectors; optical fibre cables, made up of individually sheathed fibres, whether or not assembled with electric conductors or fitted with connectors
8546	Electrical insulators of any material
8548	Electrical parts of machinery or apparatus, not specified or included elsewhere in chapter 85
8704	Motor vehicles for the transport of goods.
8906	Other vessels, including warships and lifeboats other than rowing boats
9001	Optical fibres and optical fibre bundles; optical fibre cables other than those of heading 8544; sheets and plates of polarising material; lenses (including contact lenses), prisms, mirrors and other optical elements, of any material, unmounted, other than such elements of glass not optically worked
9002	Lenses, prisms, mirrors and other optical elements, of any material, mounted, being parts of or fittings for instruments or apparatus, other than such elements of glass not optically worked
9012	Microscopes other than optical microscopes; diffraction apparatus
9020	Breathing appliances other than those of heading 9019; gas masks, excluding protective masks having neither mechanical parts nor replaceable filters

Combined Nomenclature (CN) code	Description:
9025 19	Thermometers and pyrometers, not combined with other instruments, excluding liquid-filled thermometers for direct reading
9025 80	Barometers, not combined with other instruments, electronic and other, classified under heading 9025 80.
9027 20	Chromatographs and electrophoresis instruments
9030	Oscilloscopes, spectrum analysers and other instruments and apparatus for measuring or checking electrical quantities, excluding meters of heading 9028; instruments and apparatus for measuring or detecting alpha, beta, gamma, X-ray, cosmic or other ionising radiations
9031	Measuring or checking instruments, appliances and machines not elsewhere specified in chapter 90; profile projectors
9032	Automatic regulating or controlling instruments and apparatus

8.12. Luxembourg

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited for reasons of public security or human rights considerations.

The exporter who knows or suspects that such export or these products affect or are likely to affect the national or foreign security of the country of the Grand Duchy of Luxembourg or the safeguarding of human rights, shall inform the Ministers responsible for Foreign Trade and Foreign Affairs who inform the exporter or his authorized representative of the need or not to request the authorization.

(Law of 27 June 2018, Article 45 (2)).

8.13. Hungary

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation for reasons of public security or human rights considerations.

(Par. 8/A of the Government Decree No 13 of 2011 'on foreign trade authorisation of dual-use items').

8.14 The Netherlands

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited by the Minister of Foreign Affairs for reasons of public security, including the prevention of acts of terrorism, or for human rights considerations.

(Article 4 of the Decree for Strategic Goods - Besluit strategische goederen).

National controls for the export of items for internal repression and brokering services to Syria and for the export of items for internal repression to Egypt and Ukraine have been adopted.

(Decree Goods for Dual-Use - Regeling goederen voor tweeërlei gebruik).

Authorisation requirements have been imposed for the export of 37 chemical substances to Iraq, regardless of the specific consignee or end-user.

(Decree Goods for Dual-Use Iraq – Regeling goederen voor tweeërlei gebruik Irak).

Authorisation requirements have been imposed for the export of advanced semiconductor manufacturing equipment.

(Advanced Semiconductor Manufacturing Equipment Order – Regeling geavanceerde productieapparatuur voor halfgeleiders).

8.15. Austria

The export or transit of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited for reasons of public security or human rights considerations.

(Section 20 of the 2011 Foreign Trade Act (Außenwirtschaftsgesetz 2011, BGBl. I Nr. 26/2011)).

8.16. Romania

The export of dual-use items not listed in Annex I of the Regulation but subject to the export control regime according to the provisions of Article 9, shall require an individual export authorisation.

(Extract from Article 10(1) of the GO 43/2022 on the control regime for operations concerning dual-use items).

8.17. Slovenia

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited for reasons of public security or human rights considerations.

(Article 4(3) of the Act Regulating the Control of Exports of Dual-Use Items (Zakon o nadzoru izvoza blaga z dvojno rabo (Uradni list RS, št. 37/04, 8/10 in 29/23)).

8.18. Finland

The export of dual-use items listed in the Annex of the national law (500/2024) are subject to an export authorisation. All items other than 3A901.c, 3E901 in the extent that it relates to 3A901.c, 4A902 and 4E902 have been superseded by the Commission Delegated Regulation (EU) 2025/2003.

The export of dual-use items not listed in Annex I of the Regulation or the Annex of the national law may be subject to authorisation if they are or may be intended for a use that significantly endangers public security or Finland's national security.

(Par. 6(4) and 7 of the Act No 500/2024).

8.19. Sweden

The export of dual-use items not listed in Annex I of the Regulation may be subject to authorisation or prohibited for reasons of public security or human rights considerations.

National controls on exports of dual-use items have been adopted as set out in the Annex to the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217).

9. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 11(5) OF THE REGULATION (INTRA-COMMUNITY TRANSFERS)

Article 11(5) of the Regulation stipulates that Member States imposing an authorisation requirement for the transfer from their territory to another Member State of items not listed in Annex IV to the Regulation (Annex IV lists items which do not benefit from freedom of movement in the single market) must inform the Commission, which must in turn publish this information in the *Official Journal of the European Union*.

The table below provides an overview of the measures taken by Member States, as notified to the Commission. Details on the measures are provided thereafter.

Member State	Have specific measures been taken to extend intra-EU transfer controls in application of Article 11(2)?
BELGIUM	Partially YES
BULGARIA	YES
CZECH REPUBLIC	YES
DENMARK	NO

Member State	Have specific measures been taken to extend intra-EU transfer controls in application of Article 11(2)?
GERMANY	YES
ESTONIA	YES
IRELAND	YES
GREECE	YES
SPAIN	NO
FRANCE	NO
CROATIA	YES
ITALY	NO
CYPRUS	NO
LATVIA	NO
LITHUANIA	NO
LUXEMBOURG	YES
HUNGARY	YES
MALTA	NO
NETHERLANDS	YES
AUSTRIA	NO
POLAND	NO
PORTUGAL	NO
ROMANIA	NO
SLOVENIA	NO
SLOVAKIA	YES
FINLAND	YES
SWEDEN	YES

9.1. Belgium

In the Flemish Region, an authorisation requirement for intra-EU transfers may be imposed by Ministerial decision in accordance with Article 11(2) of the Regulation. This possibility has at the date of this publication not yet been used.

(Article 4, second paragraph, of the Flemish Government Decree of 19 December 2025 regulating export, transit and transfer of dual-use items and the provision of technical assistance (Belgian Official Gazette of 26 January 2026).

9.2. Bulgaria

Bulgaria has extended intra-EU transfer controls as set out in Article 11(2) of the Regulation and has introduced a requirement for additional information to be provided to the competent authorities concerning certain intra-EU transfers as set out in Article 11(8) of the Regulation.

(Article 51, par. 8 and par. 9 of the Defence-Related Products and Dual-Use Items and Technologies Export Control Act, amended - State Gazette No. 41/2024, effective 10.05.2024)).

9.3. Czech Republic

Act No 594/2004 Coll. extends controls with regard to intra-EU transfers from the Czech Republic as set out in Article 11(2) of the Regulation.

9.4. Germany

Section 11 of the Foreign Trade and Payments Ordinance (*Aussenwirtschaftsverordnung - AWV*) extends controls with regard to intra-EU transfers from Germany as set out in Article 11(2) of the Regulation.

9.5. Estonia

The Strategic Goods Act §3(6) extends controls with regard to intra-EU transfers as stipulated in Article 11(2) of the Regulation.

9.6. Ireland

A person may not, without an authorisation, transfer a dual-use item not specified in Annex IV from the State to another Member State where he or she knows or has been informed by the competent authority that the conditions referred to in paragraphs (a), (b) and (c) of Article 11(2) of the Regulation apply to the item.

(Control of Exports Act 2023, Section 20 Obligations under Article 11, commenced 23 August 2024).

9.7. Greece

Section 3.4 of Ministerial Decision No 121837/E3/21837 of 28 September 2009 extends controls with regard to intra-EU transfers from Greece as set out in Article 11(2) of the Regulation.

9.8. Croatia

An authorisation requirement for intra-EU transfers may be imposed in individual cases with regard to dual-use items.

(Article 4(2) of the Act on Control of dual-use items, OG 83/2023)

9.9. Luxembourg

An authorization requirement may be imposed for the transfer of dual-use items, other than those listed in Annex IV to the Regulation, from the territory of the Grand Duchy of Luxembourg to another Member State in the cases provided for in Article 11(2) of the Regulation.

(Law of 27 June 2018 on export control, Article 44).

9.10. Hungary

Par. 16 of the Government Decree No 13 of 2011 'on the foreign trade authorisation of dual-use items' adopts licensing requirement on listed dual-use items for transfers within the EU if the conditions stipulated in Article 11(2) of the Regulation apply.

9.11. The Netherlands

An authorisation requirement for intra-EU transfers may be imposed in individual cases with regard to dual-use items.

(Article 4a(2) of the Decree for Strategic Goods - *Besluit strategische goederen*).

9.12. Slovakia

Par. 23(2) of the Act No 39/2011 Coll. extends controls with regard to intra-EU transfers from the Slovak Republic, as set out in Article 11(2) of the Regulation.

9.13. Finland

The Ministry for Foreign Affairs makes the transfer of dual-use items from Finland to another Member State of the European Union subject to authorisation if the conditions laid down in Article 11(2) of the Regulation are met.

(par. 6(3) of the Act No 500/2024).

9.14. Sweden

An authorisation requirement for intra-EU transfers may be imposed in accordance with article 11(2) of the Regulation with regard to dual-use items if the operator has been informed by the competent authority that the conditions in article 11(2)(a – b) are fulfilled.

For dual use items listed in Annex I of the Regulation an authorization requirement for intra-EU transfers may only be imposed if the operator has been informed by the competent authority that the items are or may be intended, in their entirety or in part, for uses referred to in Article 4(1) of the Regulation.

If an operator is aware that dual use items listed in Annex I of the Regulation which they intend to transfer in accordance with article 11(2), are or may be intended for any of the uses referred to in Article 4(1) of the Regulation, the operator shall notify the competent authority, which may decide to impose an authorisation requirement.

(Section 4 e of the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217)).

10. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 11(8) OF THE REGULATION (INTRA-COMMUNITY TRANSFERS)

Article 11(8) of the Regulation stipulates that a Member State may require that, for the transfer from their territory to another Member State of items listed in Category 5, Part 2 of Annex I, which are not listed in Annex IV to the Regulation, additional information concerning those items shall be provided to the competent authorities of that Member State.

The table below provides an overview of the measures taken by Member States, as notified to the Commission. Details on the measures are provided thereafter.

Member State	Have specific measures been taken to require additional information concerning specific items in application of Article 11(8)?
BELGIUM	NO
BULGARIA	YES
CZECH REPUBLIC	NO
DENMARK	NO
GERMANY	NO
ESTONIA	NO
IRELAND	NO
GREECE	NO
SPAIN	NO
FRANCE	NO
CROATIA	NO
ITALY	NO
CYPRUS	NO
LATVIA	NO
LITHUANIA	NO
LUXEMBOURG	YES

Member State	Have specific measures been taken to require additional information concerning specific items in application of Article 11(8)?
HUNGARY	NO
MALTA	NO
NETHERLANDS	NO
AUSTRIA	NO
POLAND	NO
PORTUGAL	NO
ROMANIA	NO
SLOVENIA	NO
SLOVAKIA	NO
FINLAND	NO
SWEDEN	NO

10.1. Bulgaria

For the transfer from the territory of the Republic of Bulgaria to the territory of another Member State of dual-use items listed in Category 5, Part 2 of Annex I and which are not listed in Annex IV to the Regulation, the Interministerial Commission may require, from the person making the transfer, additional information on the items.

(Article 51 (9) of the Defence-Related Products and Dual-Use Items and Technologies Export Control Act, (amended - State Gazette No. 41/2024, effective 10.05.2024).

10.2. Luxembourg

For the transfer from the territory of the Grand Duchy of Luxembourg to the territory of another Member State of dual-use items listed in Category 5, Part 2 of Annex I and which are not listed in Annex IV to the Regulation, the following additional information shall be provided in the frame of the authorization application:

1. Indication of the commercial reference of the item, its general description and features;
2. Presentation of the cryptology services to be provided;
3. Presentation of the implementation of the algorithms;
4. Presentation of security norms or standards;
5. Presentation of the type of data concerned by the service;
6. Document relating to the technical specifications of the item (in 12 points)

(Grand Duke Regulation of 14 December 2018, Article 10(1), paragraph 1 sub 2° and paragraph 2 sub 4°, and Annex 15).

11. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 12(6)(B) OF THE REGULATION (NATIONAL GENERAL EXPORT AUTHORISATIONS)

Article 12(6)(b) of the Regulation requires the Commission to publish measures taken by Member States with regard to any national general export authorisations issued or modified.

The table below provides an overview of the measures taken by Member States, as notified to the Commission. Details on the measures are provided thereafter.

Member State	Has your Member State issued or modified a national general export authorisations in application of Article 12(6)?
BELGIUM	NO
BULGARIA	NO
CZECH REPUBLIC	NO
DENMARK	YES
GERMANY	YES
ESTONIA	NO
IRELAND	NO
GREECE	NO
SPAIN	NO
FRANCE	YES
CROATIA	YES (but NOT in use)
ITALY	YES
CYPRUS	NO
LATVIA	NO
LITHUANIA	NO
LUXEMBOURG	NO
HUNGARY	NO
MALTA	NO
NETHERLANDS	YES
AUSTRIA	YES
POLAND	YES
PORTUGAL	NO
ROMANIA	NO
SLOVENIA	NO
SLOVAKIA	NO
FINLAND	YES
SWEDEN	NO

11.1. Denmark

There are three National General Export Authorizations in force in Denmark

DK-GNT2	for the export of certain dual-use goods to certain end-users in Ukraine
DK-GNT3	for the export of certain dual-use goods to Greenland
DK-GNT4	for the transfer of certain dual-use goods within the European Union

11.2. Germany

There are thirteen National General Export Authorisations in force in Germany:

1	General Authorisation N° 12 for the export of certain dual-use goods below a certain value threshold;
2	General Authorisation N° 13 for the export of certain dual-use goods in certain circumstances;
3	General Authorisation N° 14 for heat exchangers, valves and pumps;
4	General Authorisation N° 16 for the export of telecommunications and data security items;
5	General Authorisation N° 17 for the export of frequency changers.
6	General Authorisation No 32 for the export of certain dual-use items to Ukraine (except for areas not controlled by the Ukrainian government) to (i) state agencies, institutions and organisations of the Ukrainian government, (ii) certain humanitarian aid agencies, (iii) certain media representatives, humanitarian aid workers, development workers and assigned personnel for these individuals, solely for their own use
7	General Authorisation No 37 for the export of certain dual-use items to certain destinations
8	General Authorisation No 38 for the export of certain software to certain destinations
9	General Authorisation No 39 for the intra-EU transfer of certain items controlled by Annex IV to Regulation (EU) 2021/821
10	General Authorisation No 40 for the export of certain chemicals to certain destinations
11	General Authorisation No 41 for the export of spare parts listed in Annex I to Regulation (EU) 2021/821 under certain conditions
12	General Authorisation No. 43 for the Re-export of dual-use goods to certain countries
13	General Authorisation No. 44 for certain exports through electronic means (ITT)

11.3. France

There are eight National General Export Authorisations in force in France:

1	National General Export Authorisation for industrial goods, as defined in the decree of 18 July 2002 concerning the export of industrial goods subject to strategic control in the European Community [as published in the <i>Official Journal of the French Republic</i> No 176 of 30 July 2002 (text 11) and as amended by the decree of 21 June 2004 concerning the enlargement of the European Union as published in the <i>Official Journal of the French Republic</i> of 31 July 2004 (text 5)];
2	National General Export Authorisation for chemical products, as defined in the decree of 18 July 2002 concerning the export of dual-use chemical products [as published in the <i>Official Journal of the French Republic</i> No 176 of 30 July 2002 (text 12) and as amended by the decree of 21 June 2004 concerning the enlargement of the European Union as published in the <i>Official Journal of the French Republic</i> of 31 July 2004 (text 6)];
3	National General Export Authorisation for graphite, as defined in the decree of 18 July 2002 concerning the export of nuclear quality graphite [as published in the <i>Official Journal of the French Republic</i> No 176 of 30 July 2002 (text 13) and as amended by the decree of 21 June 2004 concerning the enlargement of the European Union as published in the <i>Official Journal of the French Republic</i> of 31 July 2004 (text 7)];
4	National General Export Authorisation for biological products, as defined in the decree of 14 May 2007 and amended by the decree of 18 March 2010 concerning the export of certain genetic elements and genetically modified organisms [as published in the <i>Official Journal of the French Republic</i> of 20 March 2010];

5	National General Export Authorisation for certain dual-use items for French armed forces in third countries (Ministerial Order of 31 July 2014, published in the French Official Gazette of 8 August 2014);
6	National General Authorisation for the export or transfer within the EU of certain dual-use items for exhibition or fair (Ministerial Order of 31 July 2014 published in the French Official Gazette of 8 August 2014).
7	National General Authorization for the export of dual-use items for the repair of civil aircraft, also named National General Authorization for “aeronautical equipment” (Ministerial Order of 14 January 2019 published in the <i>Official Journal of the French Republic</i> of 18 January 2019 (text 19).
8	National General Export Authorisation for the export of low-value dual-use items (Ministerial Order of 25 June 2021 published in the Official Journal of the French Republic of 25 July 2021 – Text 11).

The specific items covered by the authorisations are set out in the relevant decrees.

11.4. Croatia

A National General Export Authorisation for the export of dual-use items in accordance with Article 12(6) of the Regulation may be issued by the Ministry of Foreign and European Affairs.

(Article 11(4) of the Act on Control of Dual-Use Items, OG 83/2023).

11.5. Italy

A National General Export Authorisation applies for export of certain dual-use items to the following destinations: Antarctica (Italian bases), Argentina, Republic of Korea, Turkey.

(Decree of 4 August 2003 published in the Official Journal No 202 of 1 September 2003).

11.6. The Netherlands

There is one National General Export Authorisation in force in the Netherlands:

	<p>A National General Export Authorisation for the export of items for information security to all destinations, with the exception of:</p> <ul style="list-style-type: none"> — Countries that are subject to an arms embargo, according to article 2(19) of the Regulation; — Afghanistan, Armenia, Azerbaijan, Bahrein, Bangladesh, Burundi, China (including Taiwan, Hong Kong and Macau), Cuba, Djibouti, Egypt, Equatorial-Guinea, Ethiopia, Gambia, Guinee(-Conakry), Guinee-Bissau, India, Israel, Yemen, Kazakhstan, Kuwait, Laos, Ukraine, Uzbekistan, Oman, Pakistan, Qatar, Rwanda, Saudi-Arabia, Swaziland, Syria, Tadjhikistan, Thailand, Turkey, Turkmenistan, United Arab Emirates, Vietnam. <p>(National General Authorisation NL010 – Nationale Uitvoervergunningen NL 010 (<i>items voor informatiebeveiliging</i>))</p>
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11.7. Austria

There are three National General Export Authorisations in force in Austria:

1	AT002 for the export of certain dual-use goods below a certain value threshold;
2	AT003 for valves and pumps specified in entries 2B350g and 2B350i to certain destinations;
3	AT004 for frequency changers specified in entry 3A225 and related software and technology.

The details of these authorisations are set out in Sections 3a through 3c of the First Foreign Trade Ordinance, BGBl. II No 343/2011 of 28 October 2011 as amended by Ordinance BGBl. II No 430/2015 of 17 December 2015. The conditions for their use (registration and notification requirements) can be found in Section 16 of the same Ordinance.

11.8. Poland

A National General Export Authorisation “ZG-PL-DU-1” applies for export of dual-use items specified in the entry 9A012a1 of the Annex I to Ukraine.

(Regulation of the Minister of Development and Technology for National General Export Authorization (Journal of Laws of 2022, item 1567, as amended).

11.9. Finland

A National General Export Authorisation FI001 for the export of dual-use items listed in the Annex of the national law (500/2024) in accordance with Article 12(6) of the Regulation has been issued by the Ministry of Foreign Affairs pursuant to section 8 of the Act No 500/2024.

12. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 22 OF THE REGULATION (SPECIALLY EMPOWERED CUSTOMS OFFICES)

Article 22 of the Regulation requires Member States to inform the Commission if they have availed themselves of the option to have customs formalities for the export of dual-use items completed only at customs offices empowered to that end.

The table below provides an overview of the measures taken by Member States, as notified to the Commission. Details on the measures are provided thereafter.

Member State	Have specific customs offices been designated, in accordance with Article 22(1), in which customs formalities for the export of dual-use items may be completed?
BELGIUM	NO
BULGARIA	YES
CZECH REPUBLIC	NO
DENMARK	NO
GERMANY	NO
ESTONIA	YES
IRELAND	NO
GREECE	NO
SPAIN	NO
FRANCE	NO
CROATIA	NO
ITALY	NO
CYPRUS	NO
LATVIA	NO
LITHUANIA	YES
LUXEMBOURG	NO

Member State	Have specific customs offices been designated, in accordance with Article 22(1), in which customs formalities for the export of dual-use items may be completed?
HUNGARY	NO
MALTA	NO
NETHERLANDS	NO
AUSTRIA	NO
POLAND	YES
PORTUGAL	NO
ROMANIA	YES
SLOVENIA	NO
SLOVAKIA	NO
FINLAND	NO
SWEDEN	NO

12.1. Bulgaria

The territorial customs offices of the Republic of Bulgaria for strategic goods have been approved by the General Director of the Customs Agency under Ministry of Finance Order No 3AM-324/32-54835 of 17 February 2022 (Official Gazette 16/2022). The list of customs offices in Bulgaria through which dual-use items and technologies may leave or enter the EU customs territory can be found on the following website: <https://customs.bg/wps/portal/agency/regulations/customs-legislation>

12.2. Estonia

The list of customs offices in Estonia through which dual-use items and technologies may leave or enter the EU customs territory can be found on the following website:

<http://www.emta.ee/index.php?id=24795>

12.3. Lithuania

The list of customs offices in Lithuania through which dual-use items and technologies may leave or enter the EU customs territory can be found on the following website:

<https://www.lrmuitine.lt/web/guest/verslui/apribojimai/bendra#en>

12.4. Poland

The list of customs offices in Poland through which dual-use items and technologies may leave or enter the EU customs territory can be found on the following website: <http://isap.sejm.gov.pl/DetailsServlet?id=WDU20150000136&min=1>

12.5. Romania

The list of customs offices in Romania through which dual-use items and technologies may leave or enter the EU customs territory can be found on the following website: <https://www.customs.ro/agenti-economici/instruirea-operatorilor-economici/vamuirea-marfurilor/produse-strategice>

13. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLES 23(1)(A) OF THE REGULATION (NATIONAL AUTHORITIES EMPOWERED TO: GRANT EXPORT AUTHORISATIONS FOR DUAL-USE ITEMS; GRANT AUTHORISATIONS UNDER THE REGULATION FOR THE PROVISIONS OF BROKERING SERVICES AND TECHNICAL ASSISTANCE; PROHIBIT THE TRANSIT OF NON-UNION DUAL-USE ITEMS UNDER THE REGULATION)

Article 23(1)(a) of the Regulation requires the Commission to publish the list of authorities empowered to:

- grant export authorisations for dual-use items;
- grant authorisations under the Regulation for the provision of brokering services and technical assistance;
- prohibit the transit of non-Union dual-use items under the Regulation.

13.1. Belgium

For the Brussels Capital Region (localities with postal codes 1000 to 1299)

Service public régional de Bruxelles - Brussels International-
Cellule licences - Cel vergunningen
Mr Cataldo ALU
Iris Tower, Place Saint-Lazare 2 Sint-Lazarusplein, 1035 Bruxelles/Brussel
BELGIQUE/BELGIË
Tel. +32 2 8003727
E-mail: calu@sprb.brussels
Website: <https://du-arms.brussels>

For the Walloon Region (localities with postal codes 1300 to 1499 and 4000 to 7999)

Service public de Wallonie
Direction Générale de l'Économie, de l'Emploi et de la Recherche
Direction des Licences d'Armes
Boulevard Cauchy 43-45, 5000 Namur
BELGIQUE
Tel. +32 81 237 640
E-mail: double.usage@spw.wallonie.be
Website: Armes et biens et technologies à double usage - L'économie en Wallonie

For the Flanders Region (localities with postal codes 1500 to 3999 and 8000 to 9999)

Flanders Chancellery and Foreign Office
Strategic Goods Control Unit
Mailing address only: Koning Albert II-laan 15 bus 214, 1210 Brussel
BELGIË
E-mail: csg@vlaanderen.be
Website: www.fdfa.be/csg

13.2. Bulgaria

Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction with the Minister for Economy and Industry
8 Slavyanska Street, 1000 Sofia
BULGARIA
Tel. +359 29407030
Fax +359 29880727
E-mail: l.chotov@mi.government.bg and exportcontrol@mi.government.bg
Website: <https://exportcontrol.mi.government.bg>; <http://www.mi.government.bg>

13.3. Czech Republic

Ministry of Industry and Trade Licensing Office
Na Františku 32 110 15 Prague 1
CZECH REPUBLIC
Tel. +420 224907638
Fax +420 224214558 or +420 224221811
E-mail: leitgeb@mpo.cz or dual@mpo.cz
Website: www.mpo.cz

13.4. Denmark

Exportcontrols Danish Business Authority
Langelinie Allé 17, 2100 Copenhagen
DENMARK
Tel. +45 3529 1000
Fax +45 3546 6632
E-mail: eksportkontrol@erst.dk
Website: in English: <https://eksportkontrol.erhvervsstyrelsen.dk/english>; in Danish: <https://eksportkontrol.erhvervsstyrelsen.dk>

13.5. Germany

Federal Office for Economic Affairs and Export Control (*Bundesamt für Wirtschaft und Ausfuhrkontrolle*)
Frankfurter Strasse 29-35 65760 Eschborn
GERMANY
Tel. +49 6196908-0
Fax +49 6196908-1800
E-mail: ausfuhrkontrolle@bafa.bund.de
Website: <http://www.bafa.de/Ausfuhr>

13.6. Estonia

Strategic Goods Commission,
Ministry of Foreign Affairs
Islandi väljak 1, 15049 Tallinn
ESTONIA
Tel. +372 6377192
Fax +372 6377199
E-mail: stratkom@vm.ee
Website: in English: <http://www.vm.ee/?q=en/taxonomy/term/58>;
in Estonian: <http://www.vm.ee/?q=taxonomy/term/50>

13.7. Ireland

Trade Regulation and Investment Screening Unit
Department of Enterprise, Tourism and Employment
1 Earlsfort Centre, Lower Hatch Street, Dublin 2 D02 PW01
IRELAND
Tel. +353 16312328
Email: exportcontrol@enterprise.gov.ie
Website: <https://enterprise.gov.ie/en/what-we-do/trade-investment/export-controls/>

13.8. Greece

Ministry of Foreign Affairs
General Secretariat of International Economic Relations and Openness
B6 Directorate for Multilateral Economic Relations and Trade Policy
Zalokosta str. 10, 106 71 Athens
GREECE
Tel. +30 2103682785, -2786, -2762, -2758
Email: db6@mfa.gr db6.licences@mfa.gr
Website: <https://www.mfa.gr> <https://agora.mfa.gr>

13.9. Spain

The General Secretariat for Foreign Trade (Secretaría General de Comercio Exterior), the Customs Department (Agencia Tributaria - Aduanas) and the Foreign Office Ministry (Ministerio de Asuntos Exteriores, Unión Europea y Cooperación) are the authorities empowered to grant licences and to decide to prohibit the transit of non-Community dual-use items.

Contact point in the Licensing Office: Mr. Ramón Muro Martínez. Subdirector General.

Ministerio de Industria, Comercio y Turismo

Paseo de la Castellana, 162, 7a 28046 Madrid

SPAIN

Tel. +34 913492587

Fax +34 913492470

E-mail: rmuro@mincotur.es; sgdefensa.sccc@comercio.mineco.es

Website: https://comercio.gob.es/ImportacionExportacion/Informes_Estadisticas/Paginas/Historico_Material_Defensa.aspx

13.10. France

Ministère de l'Économie, des Finances et de la Souveraineté industrielle, énergétique et numérique

Direction Générale des Entreprises

Service des biens à double usage (SBDU)

67, rue Barbès – BP 80001, 94201 Ivry-sur-Seine Cedex

FRANCE

Tel. +33 1 79 84 34 19

E-mail: doublusage@finances.gouv.fr

Website: <https://www.entreprises.gouv.fr/biens-double-usage>

13.11. Croatia

Ministry of Foreign and European Affairs

Directorate for Economic Affairs and Development Cooperation

Export Control Division

Trg N. Š. Zrinskog 7-8, 10000 Zagreb

CROATIA

Tel: +385 1 4598 123, +385 1 4598 122

Fax: +385 1 4597 788

E-mail: kontrola.izvoza@mvep.hr

Website: <https://mvep.gov.hr/o-hrvatskom-izvozu/kontrola-izvoza/export-control/245193>

13.12. Italy

Ministry of Foreign Affairs and International Cooperation

National Authority - UAMA (Unit for the Authorizations of Armament Materials) Piazzale della Farnesina 1, 00135 Rome

ITALY

Tel. +39 06 3691 2853 - 5332 - 3171 - 2932

Email: uama.dualuse@esteri.it; uama.dualuse@cert.esteri.it

Internet: https://urldefense.com/v3/__https://www.esteri.it/it/diplomazia-economica-e-politica-commerciale/uama/__;!!

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13.13. Cyprus

Ministry of Energy, Commerce and Industry

6, Andrea Araouzou, 1421 Nicosia

CYPRUS

Tel. +357 22867100, 22867197

Fax +357 22375120, 22375443

E-mail: pevgeniou@meci.gov.cy

Website: <https://www.trade.gov.cy/en/sections/export-licenses-of-strategic-items;>

13.14. Latvia

Control Committee for Strategic Goods
Chairman of the Committee: Mr Andris Pelšs
Executive Secretary: Mr Nauris Rumpe
Ministry of Foreign Affairs
3, K. Valdemara street, Riga, LV-1395
LATVIA
Tel. +371 67016426
E-mail: nauris.rumpe@mfa.gov.lv
Website: <https://www.mfa.gov.lv/tautiesiem-arzemes/aktualitates-tautiesiem/20440-strategiskas-nozimes-precu-kontrole?lang=lv-LV>

13.15. Lithuania

Authority empowered to grant export authorisations for dual-use items and authorities empowered to grant authorisations for the provision of brokering services, technical assistance and transit:

Ministry of Economy and Innovation of the Republic of Lithuania
Gedimino ave. 38, LT-01104 Vilnius
LITHUANIA
Contact details:
Strategic Goods and Sanctions Policy Directorate
Tel. +370 65906035, +370 65915769
E-mail: vienaslangelis@eimin.lt
Website: <http://eimin.lrv.lt/lt/veiklos-sritys/eksportas/strateginiu-prekiu-kontrole>

Authority empowered to prohibit the transit of non-Community dual-use items:

Customs Department under the Ministry of Finance of the Republic of Lithuania
A. Jaksto str. 1/25 LT-01105 Vilnius
LITHUANIA
Contact details:
Customs Criminal Service
Tel. +370 52616960
E-mail: budetmd@lrmuitine.lt

13.16. Luxembourg

Ministry of Foreign and European Affairs, Defence, Development Cooperation and Foreign Trade
Office for Export, Import and Transit Controls (OCEIT)
9, rue du Palais de Justice, L-1841 Luxembourg
LUXEMBOURG
Tel. (+352) 247 74114
Email : oceit@mae.etat.lu
Website: <https://guichet.public.lu/fr/entreprises/import-export/licences.html>

13.17. Hungary

Government Office of the Capital City Budapest
Department of Trade, Defence Industry, Export Control and Precious Metal Assay
Export Control Unit
Németvölgyi út 37-39, 1124 Budapest
HUNGARY
Tel. +36 14585577
Fax +36 14585869
E-mail: exportcontrol@bfkh.gov.hu
Website: http://mkeh.gov.hu/haditechnika/kettos_felhasznalasu

13.18. Malta

Commerce Department Mr Brian Montebello Trade Services
MALTA
Tel. +356 25690214
Fax +356 21240516
E-mail: brian.montebello@gov.mt
Website: <https://commerce.gov.mt/en/trade-related-services-and-projects-directorate/dual-use-trade-controls/>

13.19. The Netherlands

Ministry for Foreign Affairs
Directorate-General for Foreign Economic Relations
International Trade Policy and Economic Governance Department
PO Box 20061 2500 EB The Hague
THE NETHERLANDS
Tel. +31 (0)703486486
Website: www.rijksoverheid.nl/exportcontrole
Dutch Customs/Central Office for Import and Export
PO Box 30003 9700 RD Groningen
THE NETHERLANDS
Tel. +31 8815121228 881512122
E-mail : <https://www.berichtenbox.antwoordvoorbedrijven.nl>
Website: Centrale dienst voor in- en uitvoer (CDIU)

13.20. Austria

Federal Ministry of Economy, Energy and Tourism
Department for Export Controls
Stubenring 1 1010 Vienna
AUSTRIA
Tel. +43 1 71100802335
Fax +43 1 71100808366
E-mail: exportkontrolle@bmwet.gv.at
Website: <https://www.bmwet.gv.at/Themen/Exportkontrolle>

13.21. Poland

Ministry of Entrepreneurship and Technology
Department for Trade in Strategic Goods and Technical Safety
Pl. Trzech Krzyzy 3/5 00-507 Warszawa
POLAND
Tel.: +48 22 262 96 65
Fax: +48 22 2629140
E-mail: SekretariatDOT@mpit.gov.pl
Website: <https://www.gov.pl/web/przedsiębiorczosc-technologie/zezwozenia-na-obrot-produktami-podwojnego-zastosowania>

13.22. Portugal

Autoridade Tributária e Aduaneira
Customs and Taxes Authority
Rua da Alfândega, 5, 1049-006 Lisboa
PORTUGAL
Director: Luísa Nobre; Licence Officer: Maria Oliveira
Tel. +351 218813843
Fax +351 218813986
E-mail: dsl@at.gov.pt
Website: https://info-aduaneiro.portaldasfinancas.gov.pt/pt/licenciamento/bens_tecnologias_duplo_uso/Pages/bens-e-tecnologias-de-duplo-uso.aspx

13.23. Romania

Ministry of Foreign Affairs
Department for Export Controls
ANCEX Str. Polonă nr. 8, sector 1, 010501, București
ROMANIA
Tel. +40 374306905, +40 374306935, +40 374306950
Email: dancex@mae.ro
Website: <https://ancex.ro/athome-2/>

13.24. Slovenia

Ministry of the Economy, Tourism and Sport,
Kotnikova ulica 5,
SI-1000 Ljubljana
SLOVENIA
Tel. +386 14003564
Fax +386 14003588
Email: gp.mgts@gov.si
Website: <https://www.gov.si/teme/nadzor-strateske-trgovine/>

13.25. Slovakia

For the purposes of Article 9(6) (a) and Article 10(4) of the Regulation:

Ministry of Economy of the Slovak Republic
Department of Trade Measures
Mlynské nivy 44/a, 827 15 Bratislava 212
SLOVAKIA
Tel. +421 248544059
Fax +421 243423915
E-mail: Monika.Maruniakova@mhsr.sk
Website: www.economy.gov.sk

For the purpose of Article 9(6)(b) of the Regulation:

Criminal Office of the Financial Administration
Department of Drugs and Hazardous materials
Coordination Unit
Bajkalská 24, 824 97 Bratislava
SLOVAKIA
Tel. +421 2 58251221
E-mail: Jozef.Pullmann@financnasprava.sk

13.26. Finland

Ministry for Foreign Affairs of Finland
Export Control Unit
Merikasarminkatu 5F
FI - 00160 HELSINKI
Postal address:
PO Box 176
FI-00023 GOVERNMENT
FINLAND
Tel. +358 295 350 000
E-mail: KPO-40@gov.fi
Website: <https://um.fi/export-control>

13.27. Sweden

1. Inspectorate of Strategic Products (ISP) Inspektionen för strategiska produkter

Visiting address: Vretenvägen 13B, Solna, Postal address: Box 6086, SE-171 06 Solna
 SWEDEN
 Tel. +46 84063100
 Fax +46 84203100
 E-mail: registrator@isp.se
 Website: <http://www.isp.se/>

ISP is empowered to grant authorisations in all cases except those listed under 2 below

2. Swedish Radiation Safety Authority (Strålsäkerhetsmyndigheten) Section of Nuclear Non-proliferation and Security.

Solna strandväg 96 SE-171 16 Stockholm
 SWEDEN
 Tel. +46 87994000
 Fax +46 87994010
 E-Mail: registrator@ssm.se
 Website: <http://www.ssm.se>

The Swedish Radiation Safety Authority is empowered to grant authorisations on and prohibit transit of products in Annex 1, Category 0, to the Regulation.

14. INFORMATION PROVIDED BY MEMBER STATES AS REGARDS ARTICLE 23(1)(B) OF THE REGULATION (PENALTIES APPLICABLE TO INFRINGEMENTS OF THE PROVISIONS OF THE REGULATION OR OF THOSE ADOPTED FOR ITS IMPLEMENTATION)

Article 23(1)(b), in conjunction with Article 25(1) of the Regulation requires the Commission to publish in the *Official Journal of the European Union* measures taken by Member States to ensure the proper enforcement of this Regulation, in particular regarding the penalties applicable to infringements of the provisions of this Regulation or of those adopted for its implementation.

The table below provides an overview of the measures taken by Member States, as notified to the Commission.

Member State	Relevant legislation	Administrative penalties	Criminal penalties
BE	<ul style="list-style-type: none"> — Act of 11 September 1962 concerning the Import, export and transit of goods and the associated technology — Article 231 of the General Act on Customs and Excise who defines the authority to determine and prosecute 	<ul style="list-style-type: none"> — Fine of up to 2 times the value of the goods — Confiscation of the goods (“Declaring the goods forfeited”) 	<ul style="list-style-type: none"> — Prison sentence up to 5 years
BG	<ul style="list-style-type: none"> — Defence-related products and dual-use items and technologies export control Law (State Gazette No 26/29.03.2011) — Criminal Code 	<ul style="list-style-type: none"> — Fine up to BGN 500.000 (approx. EUR 250.000) (Art. 72, 73 and 74 of the Law) 	<ul style="list-style-type: none"> — Prison sentence up to ten years — Fine of up to two hundred thousand levs (approx. EUR 100.000) (Art. 339b of Criminal Code)

Member State	Relevant legislation	Administrative penalties	Criminal penalties
DK	<ul style="list-style-type: none"> — Promulgation Law no. 635 of 9 June 2011. — Promulgation Law (Criminal Code) no. 1156 of 20 September 2018. 	N/A	<p>Violation of export control rules:</p> <ul style="list-style-type: none"> — Fine (no set amount) — Prison sentence up to 2 years (§ 2 of law no. 635 of 9 June 2011). <p>Violation under aggravating circumstances: Prison sentence up to 6 years (§ 114 h of the criminal code).</p>
DE	<ul style="list-style-type: none"> — Foreign Trade and Payments Act (6 June 2013) (Außenwirtschaftsgesetz) - provides for administrative and criminal penalties in case of violations of national and European export control law — Foreign Trade and Payments Ordinance (Außenwirtschaftsverordnung) and the Administrative Offences Act (Ordnungswidrigkeitengesetz) - complements the Foreign Trade and Payments Act with regard to administrative penalties (n.b.: even the attempt at illegal export/brokering/technical assistance can constitute an infringement and is punishable). 	<p>Penalties on individuals (negligence)</p> <ul style="list-style-type: none"> — Fine up to EUR 500.000 (Para. 19 Foreign Trade and Payments Act on breaches of UN-/EU-embargos, EU- and national export control law) — Fine up to EUR 1.000.000 (Para 130, 9 Administrative Offences Act, on breaches of supervisory obligations) <p>Penalties on companies (intent or negligence)</p> <ul style="list-style-type: none"> — Fine up to EUR 40.000.000 for criminal offences of persons in a leading position (Para. 19 Foreign Trade and Payments Act, Para. 30, 9 Administrative Offences Act) — Fine up to EUR 40.000.000 for administrative offences of persons in a leading position (Para. 19 Foreign Trade and Payments Act, Para. 30, 9 Administrative Offences Act) <p>When the infringement consists of a breach of formalities:</p> <ul style="list-style-type: none"> — Administrative constraints (fines as well as other compulsory measures) <p>Note: the reliability of the exporter is a prerequisite to issue licenses according to Para. 8 Foreign Trade Act. Therefore, (former) breaches of formalities are taken into consideration in the licensing procedure, f.i. by excluding a company from facilitated procedures)</p>	<p>When the infringement is based on intent:</p> <ul style="list-style-type: none"> — Fine or prison sentence up to 15 years (Para. 17, 18 Foreign Trade and Payments Act on breaches of UN-/EU-embargos, EU- and national export control law) <p>When the infringement is based on gross negligence:</p> <ul style="list-style-type: none"> — Fine or prison sentence up to 5 years (Para. 17 on breaches of UN-/EU-embargos).

Member State	Relevant legislation	Administrative penalties	Criminal penalties
EE	<ul style="list-style-type: none"> — Strategic Goods Act — Penal Code 	<ul style="list-style-type: none"> — Fine up to approx. EUR 400 (violation of notification obligation by physical person) — Fine up to EUR 640 (violation of notification obligation by legal person) 	<ul style="list-style-type: none"> — Fine (unlimited), or — Prison sentence up to 20 years
IE	<ul style="list-style-type: none"> — Control of Exports Act 2008 	<ul style="list-style-type: none"> — N/A 	<ul style="list-style-type: none"> — Fine up to EUR 10.000.000 or 3 times the value of the goods or technology concerned and/or — Prison sentence up to 5 years
EL	<ul style="list-style-type: none"> — Customs code — Law 2960/2001 — Law 4072/2012 	<ul style="list-style-type: none"> — Fines for inaccurate customs declarations — Confiscation of goods and means of transport in case of smuggling, or additional financial penalty equal to the value of the CIF if confiscation is impossible — Possibility to make the owner or the recipient of the goods responsible for the costs of the legal proceedings — Administrative sanctions consisting either of a ban on the exercise of the activity for up to one year, or an administrative fine of up to EUR 100 000 	<ul style="list-style-type: none"> — Imprisonment of at least 6 months — If the smuggling is of no significant value and is intended for individual use or consumption, imprisonment of at least 1 month <p>Aggravating circumstances:</p> <ul style="list-style-type: none"> — Imprisonment of at least 2 years in case of 1) repeated offence, 2) commission with arms or in group, 3) prejudice exceeding EUR 30 000 of duties, taxes or charges, 4) use of special contrivance — Imprisonment of at least 10 years if the prejudice exceeds EUR 150 000 of duties, taxes, or charges
FR	<ul style="list-style-type: none"> — Penal Code (Art. 411-6 : delivering or making available to foreign entity knowledge/goods which may harm nation's fundamental interests) — Customs Code (Art. 38, 414, 428) — Defence Code (Art. L1333-9/13, Art. L2339-14 to 18, Art. L2341-1 to 6, L2342-3 to 81) <p>All above mentioned dispositions were introduced by Law n°2011-266 dated 14 March 2011 related to fight against WMD proliferation</p> <ul style="list-style-type: none"> — Defence Code (Part 2, Book III, Title II "Security of information systems", Chapter I – Art. L2321-2-2 and L2322-1) 	<ul style="list-style-type: none"> — Fine up to 225 000 euros — Fine up to 3 times value of good — Confiscation of good — Fine up to 7 500 000 euros — Fine up to 150 000 euro — Confiscation of good 	<ul style="list-style-type: none"> — Prison sentence up to 15 years — Prison sentence up to 5 years — Prison sentence up to 30 years or life sentence — General disqualification for up to 5 years — Prison sentence up to 2 years

Member State	Relevant legislation	Administrative penalties	Criminal penalties
HR	<ul style="list-style-type: none"> — Act on the Control of Dual-Use Items (OJ 80/11, 68/13) 	<ul style="list-style-type: none"> — Fine of at least 50,000 HRK (cca EUR 6.700) for breaching the formalities (Art.22 and 23) — Fine up to max. 500,000.00 HRK (cca EUR 68.000) for other offences (e.g. lack of licence or notification) 	<ul style="list-style-type: none"> — Prison sentence from 6 months to 5 years if foreign policy interests are threatened or if international obligations and sanctions are violated — Prison sentence of at least 5 years in case of death of one or more persons or large-scale material damage (Art.24)
IT	<ul style="list-style-type: none"> — Legislative Decree 15 December 2017, no. 221 (Art. 18) (n.b.: even the attempt at illegal export/brokering/technical assistance can constitute an infringement and be punishable) 	<p>When the infringement consists of a breach of administrative formalities based on negligence:</p> <ul style="list-style-type: none"> — Fine from EUR 15.000 to EUR 90.000. 	<p>When the infringement is based on intent:</p> <ul style="list-style-type: none"> — Fine up to EUR 250.000 and/or prison sentence up to 6 years (e.g. for any export or transit without license, false declaration and/or documentation) — Seizure of the goods (or of other goods of the same value, in the possession of the exporter)
CY	<ul style="list-style-type: none"> — Defence (Export of Goods) Regulations (1993) — Ministerial Order 312/2009 	<ul style="list-style-type: none"> — Fine of up to 2.600 EUR — Confiscation of goods may be ordered by a court or in certain cases by the customs 	<ul style="list-style-type: none"> — Prison sentence up to 3 years
LV	<ul style="list-style-type: none"> — Law on the Circulation of Goods of Strategic Significance (21 June 2007) — Latvian Administrative Violations Code (1984) — Law on Customs (2 June 2016) — Criminal Law (17 June 1998) 	<ul style="list-style-type: none"> — Fine up to 750; on legal persons from EUR 280 up to 7.100 — Confiscation of the relevant goods may be applied. (Para 1791 and 20110 Latvian Administrative Violations Code) 	<p>If the provisions of the Law on the Circulation of Goods of Strategic Significance have been violated:</p> <ul style="list-style-type: none"> — Prison sentence of up to two years — Community service, deprivation of rights to perform related economic activities (Para 237 of the Criminal Law) <p>If goods of strategic significance have been exported or imported in any illegal way:</p> <ul style="list-style-type: none"> — Prison sentence of up to 12 years. — Temporary deprivation of liberty (up to 3 months), — community service, — A fine, with or without the confiscation of property. — Ban to perform related economic activities.

Member State	Relevant legislation	Administrative penalties	Criminal penalties
			— Ban to engage in specific employment or the right to take up a specific office for a period up to five years (Para 1901 The Criminal Law).
LT	<ul style="list-style-type: none"> — Code of Administrative Offences — Criminal Code (26 September 2010) 	<p>For infringements to the rules of licensing or control of export, import, transit and brokering of strategic goods imposes (Article 141 of the Code of Administrative Offences)</p> <ul style="list-style-type: none"> — Fine from EUR 90 to EUR 170 for individuals — Fine from EUR 300 to EUR 560 for heads of legal entities or foreign legal entities and subsidiaries of other organizations. 	<p>When the infringement concerns the smuggling of strategic goods:</p> <ul style="list-style-type: none"> — Prison sentence from 3 to 10 years (Article 199(4) of the Criminal Code)
LU	<ul style="list-style-type: none"> — Law of 27 June 2018 on export control (as amended) 	<ul style="list-style-type: none"> — Prohibition, limited to six months or definite, to carry out one or more activities, a suspension for a maximum period of six months from the use of any authorization or fines up to 1250€ per day, however not exceeding 25,000€ in total. (Art. 54 Law of 27 June 2018 on export control) 	<ul style="list-style-type: none"> — Criminal fines from 251€ to 1,000,000€, imprisonment from 8 days to 10 years or by one of those penalties only (Art. 57 – 61 Law of 27 June 2018 on export control) (n.b.: If the non-observation of a restrictive measure results in a substantial financial gain, the fine may be increased to four times the amount subject to the offence. Art. 58 Law of 27 June 2018 on export control)
HU	<ul style="list-style-type: none"> — Government Decree No 13 of 2011 on the foreign trade authorisation of dual-use items (Para. 15. and Para 28.) — Chapter 31 of the Criminal Code 	<ul style="list-style-type: none"> — Fine from EUR 400 to EUR 17.000 (breaches of administrative formalities) — Fine from EUR 1.700 to EUR 17.000 (violation of the conditions set out in the authorisation), or up from EUR 17.000 to 34.000 in case of aggravated circumstances (serious breach of obligations violating) <p>Other penalties: revocation or modification of licenses, deprivation of licensee's rights</p>	<ul style="list-style-type: none"> — Prison sentence from 1 to 5 years (violation of the conditions set out in the authorisation, or export without authorisation) <p>Prison sentence up to 3 years (preparation of infringement above)</p>

Member State	Relevant legislation	Administrative penalties	Criminal penalties
NL	<ul style="list-style-type: none"> — Economic Offences Act (1950) 		<p>When the infringement is based on intent, either:</p> <ul style="list-style-type: none"> — Fine up to EUR 1.100.000 or — Prison sentence up to six years, or — Work assignment — Additional penalties e.g. temporary or permanent ban to perform related economic activities, and/or confiscation of the goods and the profits gained by the illegal transaction.
AT	<ul style="list-style-type: none"> — 2011 Foreign Trade Act — 2013 Nuclear Non-Proliferation Act (SKG 2013) — Criminal Code 	<p>Some infringements, i.e. breaches of reporting requirements, constitute administrative offences:</p> <ul style="list-style-type: none"> — Fine up to EUR 25,000 (section 87 Foreign Trade Act) or — EUR 40,000 (section 26 SKG for Cat. 0 goods) 	<p>Most infringements constitute criminal offences:</p> <ul style="list-style-type: none"> — criminal fine or prison sentence up to three years in case of intent, in qualified cases up to ten years (sections 79, 80, 82 Foreign Trade Act, section 177b Criminal Code for Cat. 0 goods) — criminal fine or prison sentence up to one year in case of negligence, in qualified cases up to two years (sections 79, 80, 82 Foreign Trade Act, section 177c Criminal Code for Cat. 0 goods)
PL	<ul style="list-style-type: none"> — Act of 29 November 2000 on foreign trade in goods, technologies and services of strategic importance to the security of the State and to maintaining international peace and security (the consolidated text of the Act as amended as of 21 May 2019) — Criminal Code 	<ul style="list-style-type: none"> — Fine up to 200 000 PLN imposed by the trade control authority by a relevant administrative decision (trade without a valid licence) (Art. 37) — Fine up to 100 000 PLN: <ul style="list-style-type: none"> 1. No submission of a declaration of intended import or EU transfer of items used in telecommunications or for information security to the import monitoring authority) (Art. 37a) 2. Trade contrary to the conditions set forth in the licence (Art. 38) — Fine up to 50 000 PLN (some infringements: i.e. breaches of reporting requirements) (Art. 39) 	<ul style="list-style-type: none"> — Prison sentence from 1 to 10 years (trade without a relevant licence or contrary to conditions set forth in the licence, even unintentionally) (Art. 33.1) — Fine, restriction of liberty or imprisonment up to 2 years (if the person carrying out trade contrary to conditions set forth in the licence acts with no intent, and if this person takes actions referred to in Art. 31(1)) (Art. 33.2) — Confiscation of the goods and the profits gained by the illegal transaction

Member State	Relevant legislation	Administrative penalties	Criminal penalties
PT	— Decree Law nr. 130/2015, 9 July	— Fine up to EUR 15 000 for a private person or EUR 30.000 for a legal person (the amount of the fine is reduced by half in the case of negligence) — Accessory penalties might be applicable e.g. suspension of the use of licenses up to 2 years, prohibition of global license for 2 years.	— Prison sentence up to 5 years for natural persons — Fine up to EUR 600.000 for legal persons — Accessory penalties might be applicable e.g. prohibition of applying for licenses for a period up to 2 years, publication of the final sentence condemning the exporter at his own expenses
RO	— Government Ordinance no. 43 of 14.04.2022 on the control regime for operations concerning dual-use items	— Fine up to EUR 6 000 for infringement of formalities	— Fine or prison sentence from 1 to 5 years for the export/re-export/transfer/brokering of dual-use items without a licence
SI	— Act regulating the control of exports of dual-use items (ZNIBDR) — Penal code — Liability of Legal Persons for Criminal Offences Act	— Fine up to EUR 125.000 and additional fine up to EUR 4.100 for legal person and EUR 1.200 for a private person (ZNIBDR, Art.13)	— Fine up to EUR 500.000 ; — Prison sentence up to five years (Criminal code - Art.307) — Seizure of assets, or — Termination of legal entity (Liability of Legal Persons for Criminal Offences Act – Art.25).
SK	— Law No 39/2011 on dual-use items and on the amendment of the Act of the National Council of the Slovak Republic No 145/1995 Coll. on Administrative Fees (as amended).	— Fine up to EUR 30.000 (Offences under Section 32) — Fine up to EUR 650,000 (Other administrative offences Section 33).	
FI	— Penal code		When the infringement is based on intent: — Fine up to EUR 850.000 for legal persons — Prison sentence up to 4 years (Chapter 46, paras 1-3) When the infringement is based on negligence (applicable only when violating art 4.4 of Regulation (EC) no 428/2009): — Fine (no maximum amount) Prison sentence up to 6 months (Chapter 46, para 12)

Member State	Relevant legislation	Administrative penalties	Criminal penalties
SE	<ul style="list-style-type: none">— Dual Use Items and Technical Assistance Control Act (2000:1064), Articles 18-23— Penal code (1962:700), Chapter 36, Articles 2-22	<ul style="list-style-type: none">— N.A. (Offences of export control concerning dual use items and technical assistance are only sanctioned with criminal penalties).	<ul style="list-style-type: none">— Fine up to 150 000 SEK, or— Prison sentence of up to six years— Furthermore, property (such as goods and money) that relates to the commission of a crime can be forfeited.