



Export Licencing Webinar 2025

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About International Trade Matters

- ✓ Tailored support for SMEs and micro businesses
- ✓ Highly experienced, multi-disciplinary specialists
- ✓ Regional, industry sector and export-function expertise



What are Export Controls?

Export controls are government regulations that restrict the transfer of sensitive goods, technology, and know-how to prevent proliferation of weapons of mass destruction (WMDs), human rights abuses, and threats to national security

These controls apply to physical goods as well as intangible transfers like software, data, technology, and know-how

Compliance requires obtaining a licence, and failure to do so can result in criminal offenses and penalties

Purpose of Export Controls

National security: To prevent sensitive technologies from falling into the hands of hostile states or non-state actors

Non-proliferation: To stop the spread of Weapons of Mass Destruction (WMD) like nuclear, chemical, and biological weapons and the means to deliver them

Foreign policy and human rights: To enforce sanctions, arms embargoes, and to prevent the use of items for torture, capital punishment, or other human rights abuses

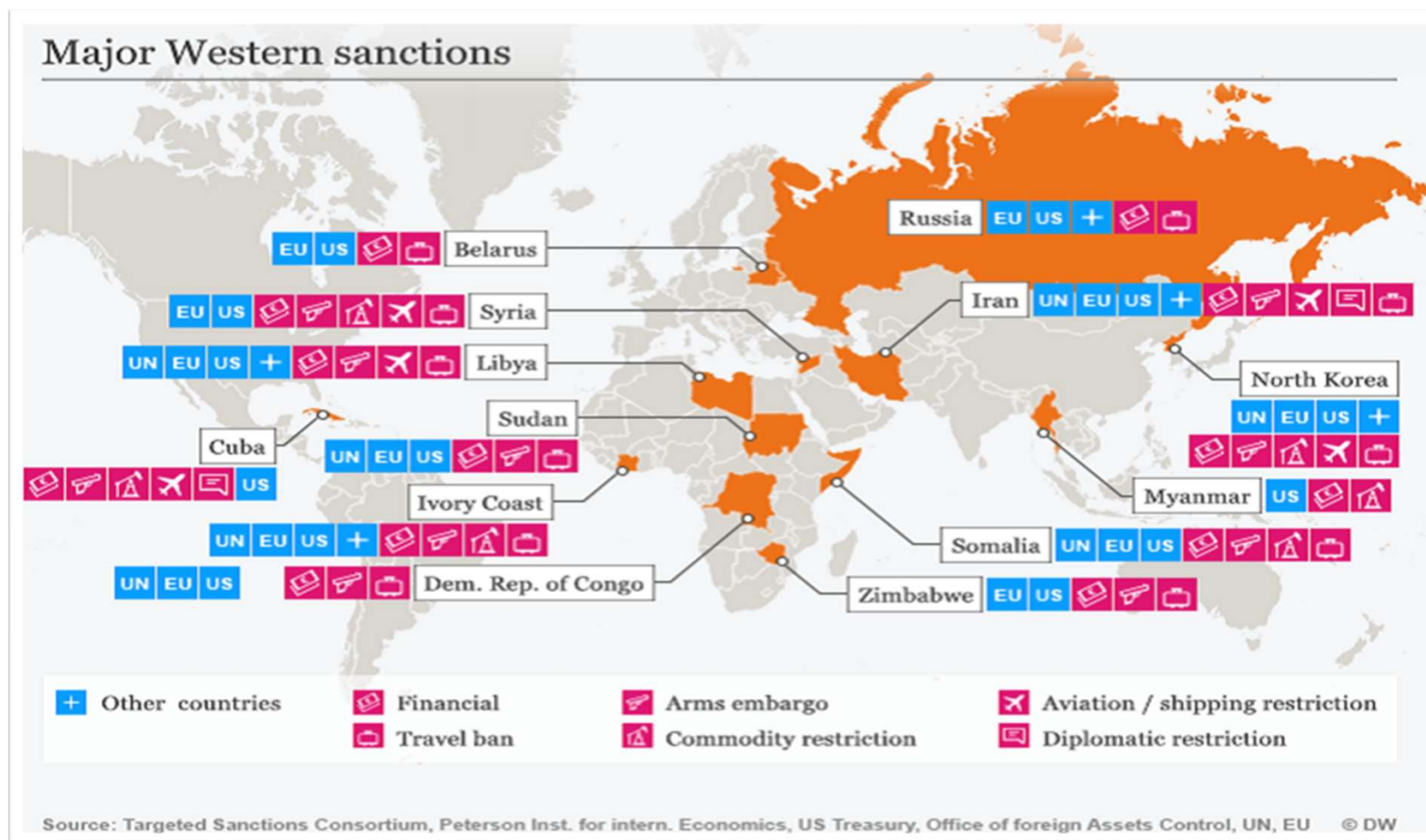
International obligations: To uphold commitments made under international treaties and agreements

Legal Basis for Export Controls

- The [Export Control Act 2002](#)
- The [Export Control Order 2008](#)
- The adopted [Council Regulation \(EC\) No 428/2009](#) (in Northern Ireland [Regulation \(EU\) 2021/821](#) of the European Parliament and of the Council of 20 May 2021) which control exports, brokering, technical assistance, transit and transfer of dual-use items

The UK also controls the export of goods which could be used for capital punishment and goods which could be used for the purpose of torture and other cruel, inhuman or degrading treatment or punishment

Western Countries Sanctions Map - 2025



Does It Apply To Me?

At first consideration, it may seem that export controls do not apply to you. However, bear in mind that:

- Your business may produce and work with highly controlled goods
- Any employee can potentially engage in an export control activity without realising it

Essential Elements for Export Control



Product - What is your product?



Destination - What is the ultimate destination for your export?



End user - Who will receive your product?



End use – What will they do with your products?



Financial - Who will pay for your product?



Conduct - What else could they do with your product?

Key Aspects to Consider

Know Your Partner

Understand the end-user and their potential risks

Check the consolidated list

Verify if your item is on the list of controlled strategic military and dual-use items

Apply for a licence

Obtain the necessary authorisation from the Export Control Joint Unit (ECJU) well in advance of any transfer

Penalties

Failure to obtain a licence is a criminal offence and can lead to fines, imprisonment, or seizure of goods



What Constitutes an “Export”?

Physical shipments of goods out of the country

Electronic transfers of software, data, or technology

The definition of “Export” is broad and includes:

Verbal communication or sharing of know-how with foreign entities

Transfers arranged between two overseas countries

What is Controlled?

Military items: Goods, software, and technology specifically designed for military use, such as firearms, aircraft, and imaging devices

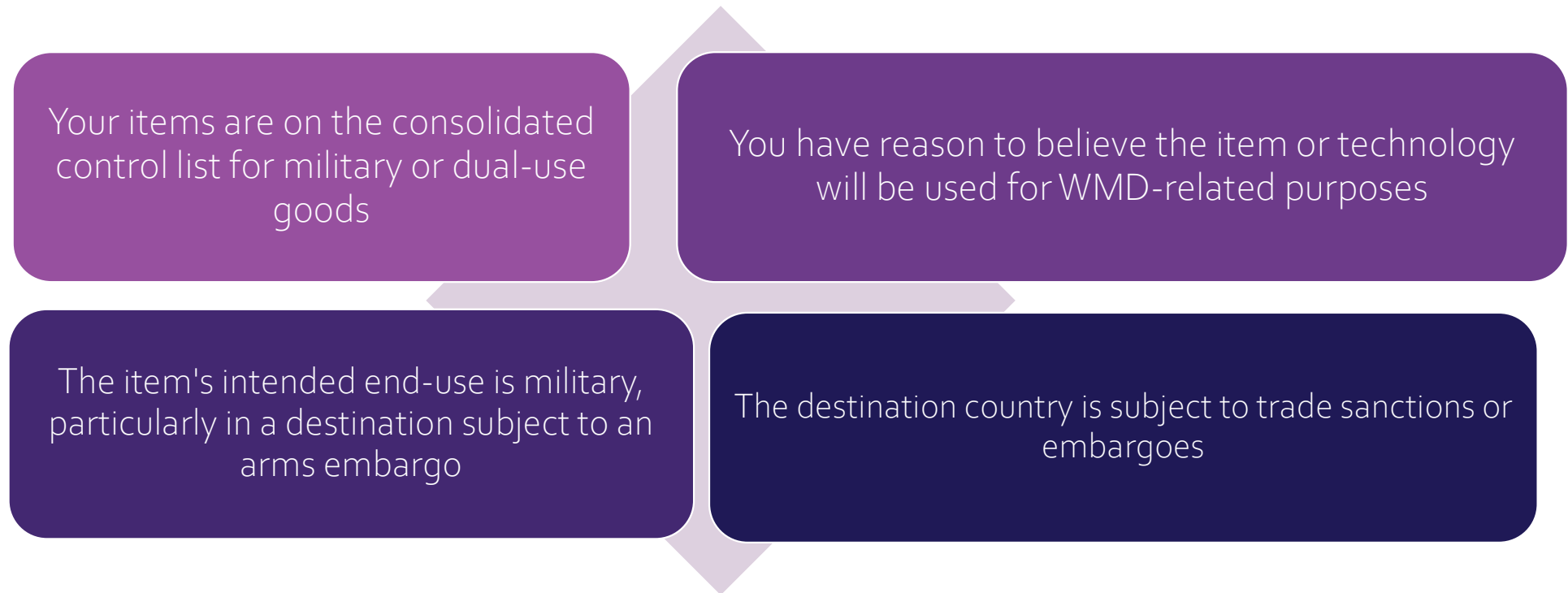
Dual-use items: Products and technologies intended for civilian use that could also have military applications. This can include high-specification electronics, certain chemicals, lasers, and software

Intangible transfers:

Sharing controlled information is considered an export, even if no physical item is moved. This can include:

- Sending emails or faxes
- Verbal communications, such as phone calls and video conferences
- Providing technical assistance or know-how through teaching, consultancy, or research collaboration

When a Licence is Needed



Is it Military or Dual Use? It cannot be both



Accurate classification against the UK Consolidated List of Strategic Export Controls will confirm to the user whether goods require export authorisation on their own merit

If an export has been specifically designed or adapted for military purpose, the rule of thumb is that a military licence will be required to support Export.

Dual use goods are captured because of their capability, rather than being exported for military end use alone

Searching the Consolidated Control List

To find out if
an item is
listed you can:

Check
the consolidated list
of strategic military
and dual use

items

Use the OGEL and
goods checker tools

Use the 'control list
classification service'
or the 'end-user
advice service'
in SPIRE

UK Strategic Export Control Lists

The UK Strategic Export Control Lists provide a useful consolidation of the various international requirements

Contents

- Introduction
- **UK Military List** [Schedule 2 to the Export Control Order 2008]
- **UK Dual-Use List** [Schedule 3 to the Export Control Order 2008]
- **EU Non-military Firearm List** [Annex I to Regulation (EU) No. 258/2012]
- **EU Human Rights List** [Annexes II, III & IV of Regulation (EU) No. 125/2019]
- **UK Security and Human Rights List** [Articles 4A and 9 to the ECO 2008]
- **UK Radioactive Source List** [Schedule to the Export of Radioactive Sources (Control) Order 2006]
- **EU Dual-Use List** [Annex I to Council Regulation (EC) No. 428/2009]:
 - Category 0 Nuclear materials, facilities and equipment
 - Category 1 Special materials and related equipment
 - Category 2 Materials processing
 - Category 3 Electronics
 - Category 4 Computers
 - Category 5 Telecommunications and "information security"
 - Category 6 Sensors and lasers
 - Category 7 Navigation and avionics
 - Category 8 Marine
 - Category 9 Aerospace and Propulsion
- **EU Dual-Use List** [Annex IV to Council Regulation (EC) No. 428/2009]

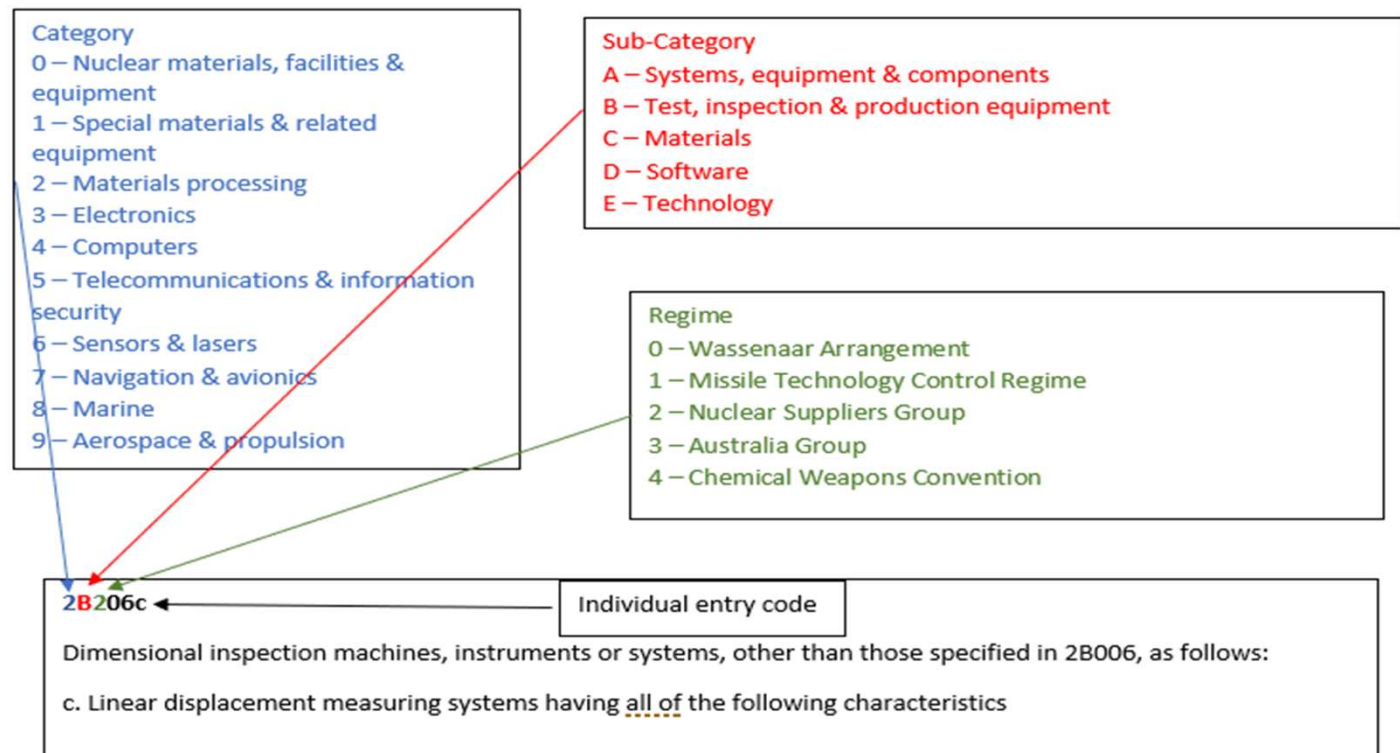
Example Control Rating

The following is an example of the way in which the UK Strategic Export Control Lists categorises goods:

2B206C

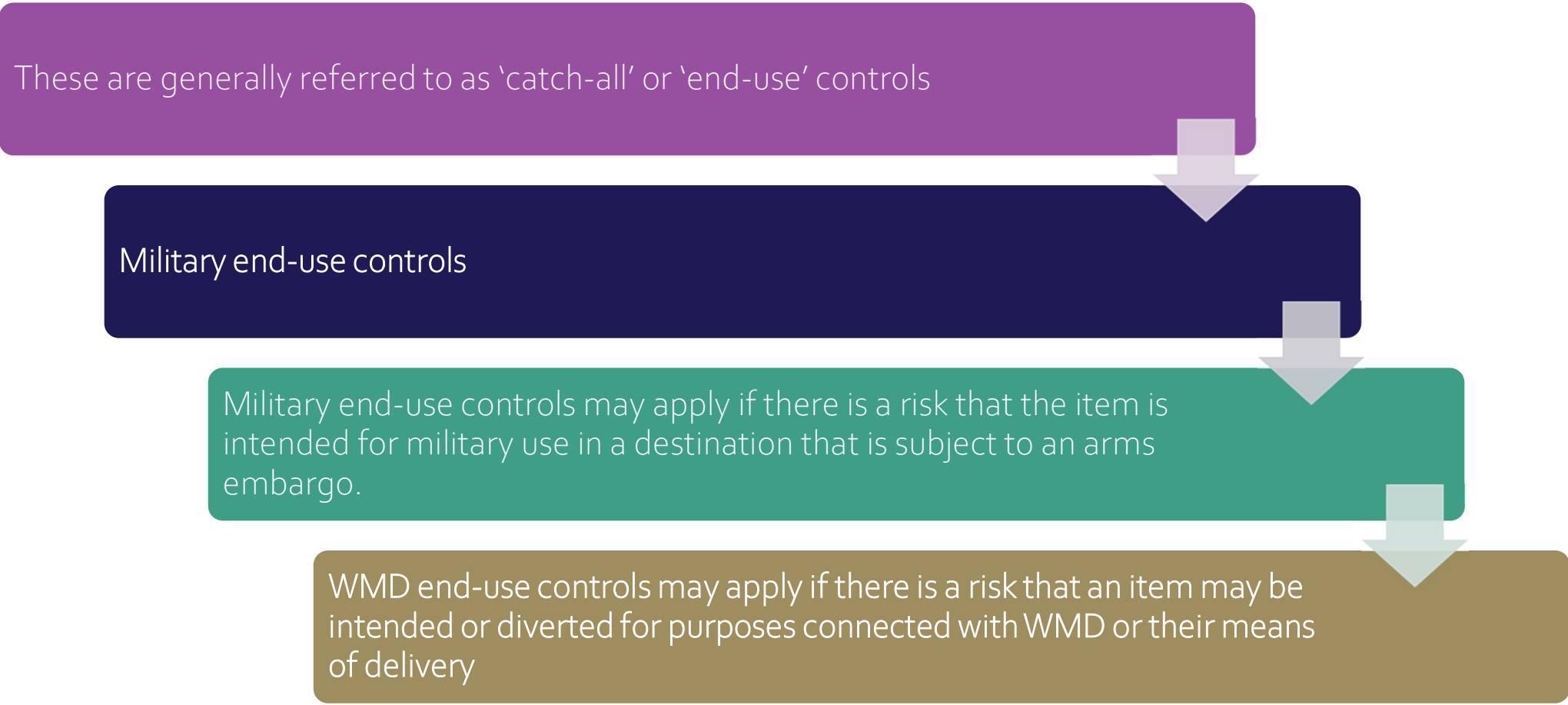
- Category 2

- Sub-category NSG



End-Use Controls

These are generally referred to as 'catch-all' or 'end-use' controls



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graph TD; A[These are generally referred to as 'catch-all' or 'end-use' controls] --> B[Military end-use controls]; B --> C[Military end-use controls may apply if there is a risk that the item is intended for military use in a destination that is subject to an arms embargo.]; C --> D[WMD end-use controls may apply if there is a risk that an item may be intended or diverted for purposes connected with WMD or their means of delivery];
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Military end-use controls

Military end-use controls may apply if there is a risk that the item is intended for military use in a destination that is subject to an arms embargo.

WMD end-use controls may apply if there is a risk that an item may be intended or diverted for purposes connected with WMD or their means of delivery

Sanctions

Sanctions are
restrictive
measures that can
be put in place to
fulfil a range of
purposes

Examples of Export Controlled Items

Arms and
ammunition

Biological agents

Body armour and
protective gear

Cameras

Ceramic based
materials & fibres

Chemical warfare
precursors

Countermeasure
technology for
controlled goods

Chemical vapor
deposition (CVD)
equipment

UK Dual-Use and Military Lists

Dual-Use List examples

- Electronic component (integrated circuits, A-D/D-A converters, travelling wave tubes, microwave transistors & amplifiers)
- Laser calibration & measurement, equipment for manufacturing semi-conductor devices
- Spectrometers
- Recording equipment
- Surveying equipment
- Radar equipment



Military List examples

ML6

- Military ground vehicles & components
- Civil vehicles with ballistic protection and ballistic components

ML4

- Bombs, grenades, rockets, missiles and other pyrotechnic devices

ML10

- Military crash helmets



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SPIRE Licence System

The SPIRE licence system is an online platform used by the UK's Export Control Joint Unit (ECJU) to process applications for various export and trade licences, such as Open General Export Licences (OGELs), Standard Individual Export Licences (SIELs), and Ministry of Defence Form 680s

While a new system called LITE is gradually replacing SPIRE, it remains active for certain applications during the transition period.

The image is a screenshot of the SPIRE (The Export Control Organisation's online export licensing system) login page. At the top left, it says 'Department for International Trade'. The main heading is 'Welcome to SPIRE' with a subtitle 'The Export Control Organisation's online export licensing system'. Below this, there is a paragraph explaining that using SPIRE, users can apply for an export or trade licence for various items including security items, military goods, civilian products designed with a military use or purpose, firearms and paramilitary goods, radioactive sources, and much more. It also mentions that SPIRE can be used to make a Ministry of Defence Form 680 application, Private Venture security grading, or Exhibition Clearance applications. The page is divided into two main sections: 'Existing Users' and 'New Users'. Under 'Existing Users', there are input fields for 'Username' and 'Password', a 'Login' button, and a link that says 'I forgot my password'. Under 'New Users', there is a link that says 'Create a new account to use SPIRE' and a section for 'Company Registration' which states 'We advise that you register your company on SPIRE, benefits include:'.

Key Points about SPIRE

Login Required:

Access to SPIRE is through a login, as it is a secure online system.

Transition to LITE:

The UK's ECJU is rolling out a new system called LITE, which will eventually replace SPIRE

Current Status:

During the transition, both SPIRE and LITE are handling applications, with LITE being ready for SIEL applications

Importance of Data Accuracy:

When preparing to use the new LITE system, it's important for businesses to ensure their data is accurate and up-to-date.

Where to access SPIRE:

The system is accessible via the [GOV.UK](https://www.gov.uk) or SPIRE website

The UK's New LITE Export Licensing System

ECJU is introducing LITE, a new digital licensing service designed to replace SPIRE.

LITE aims to streamline the export license application process in the UK by incorporating:

- increased automation to support license decision-making
- The primary goal is to save exporters time and improve the overall efficiency of the licensing process

Key features of LITE:

- Increased automation in license decision-making
- Streamlined application process
- Access to historic and current SPIRE applications after onboarding
- Faster application processing
- Clearer direction toward helpful advice during the application process

Declaring Goods for Export

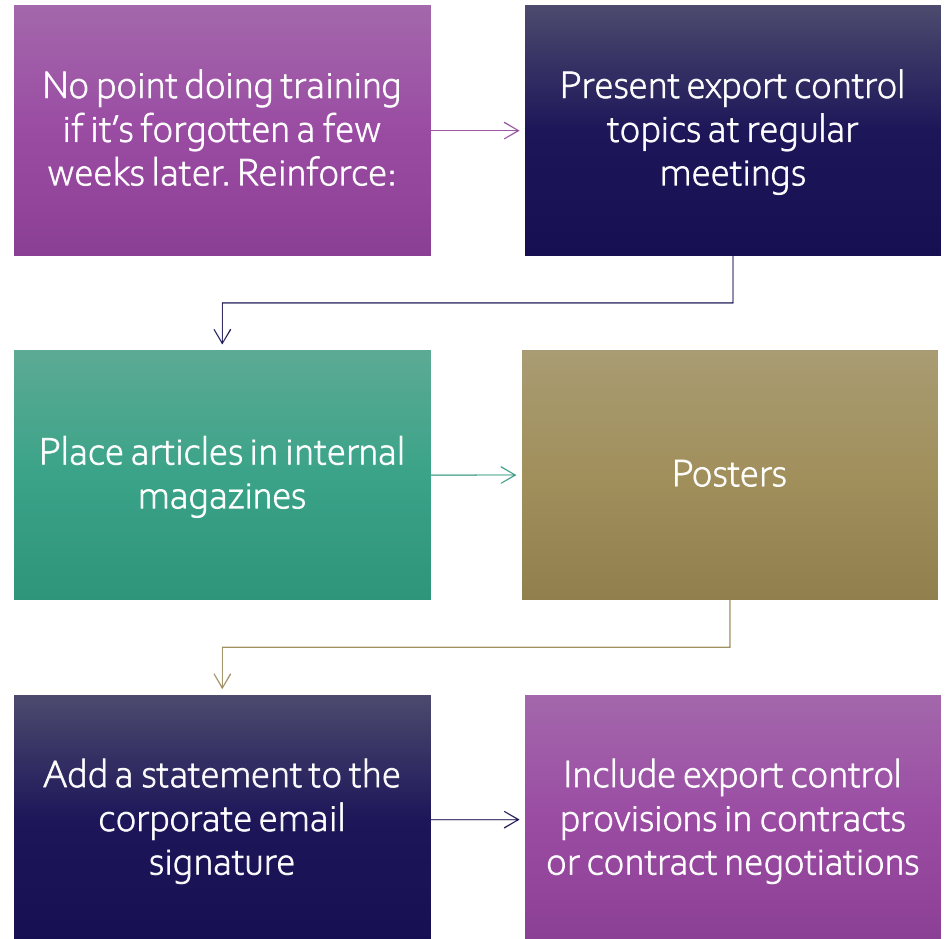
- The C88 / SAD Export Customs Declaration stipulates we advise HMRC of the consignee for our export consignment; the first recipient of the goods.
- Export Control compliance means we must go further by establishing if the consignee is also the end user of the goods.
- If the consignee and end user are separate entities, we must consider the location of the end user, and the end use the goods will be put to.

8 Steps

- Senior commitment
- Identify responsible personnel
- Information and training
- Procedures
- Screening and suspicious enquiries
- Record-keeping
- Audits
- Integration with quality management
- Practices + How to manage violations



Continuous Reinforcement



Record Keeping

1

Maintain records of all controlled activities for at least the minimum period required by law

2

Ensure that traceable records of these activities are maintained so that queries about any transactions under any licence may be readily checked and an adequate audit trail followed through

3

Establish a policy on the time, mode and place for maintaining and storing records so that it is known what information is retrievable and how

Integration with Quality Management Practices

1

Ensure that all procedures and practices for dealing with export control regulations are fully integrated with any quality management systems that may apply

2

The objective is to ensure that within quality management practices export control compliance procedures are treated in the same manner and with equal emphasis, as other business procedures.



Penalties and Fines

Breaching export controls is a criminal offence



Penalties include:

- revocation of licences
- seizure of items
- issuing of a compound penalty fine
- criminal conviction leading to a fine and/or custodial sentence



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