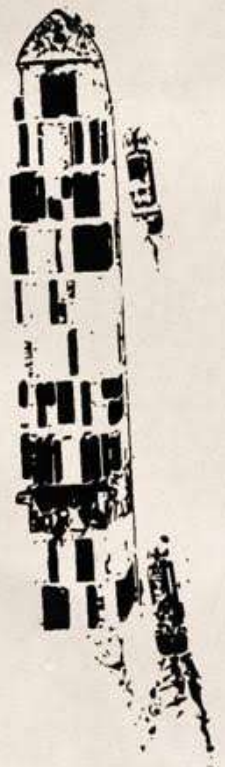
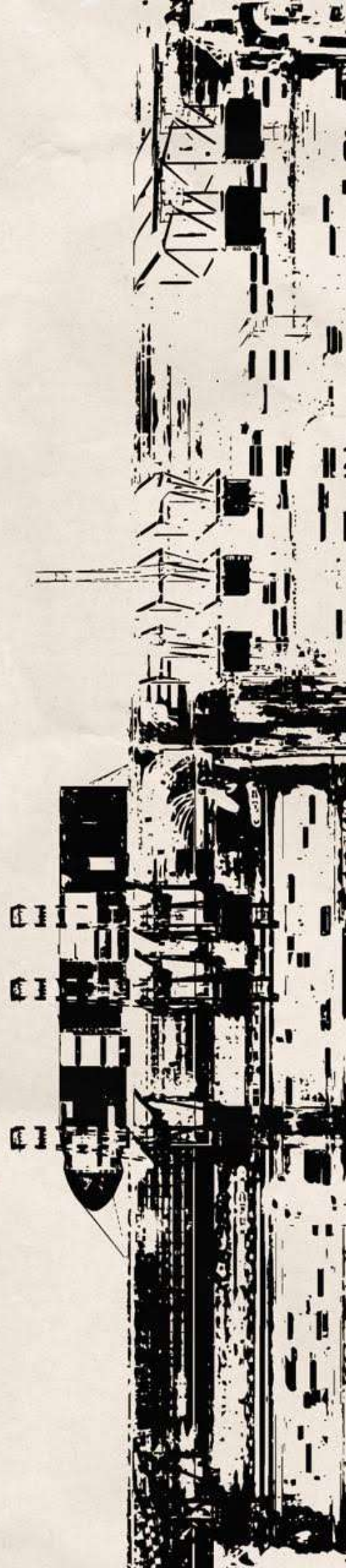


TOOLKIT FOR PORT STATE CONTROL AND MILITARY TRANSFERS



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2026

*Enhanced Due Diligence to Prevent and Deter
Illicit Maritime Transfers of Arms, Military
Equipment and Other Prohibited Items to
High-Risk Destinations*

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Items to High-Risk Destinations*

Prepared by

Associazione di Consulenza in Diritto del Mare

and

Law for Palestine



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Background

The maritime domain is the backbone of international trade and a critical infrastructure for the movement of goods across borders. United Nations Conference on Trade and Development (UNCTAD) data indicate that global trade in goods and services is valued at approximately USD 35 trillion, with maritime transport accounting for around 80 per cent of global merchandise trade by volume and over half by value.¹

The sheer scale and global reach of maritime commerce encompass the international movement of strategically, economically and legally sensitive goods, including weapons, ammunition and munitions, components, spare parts, production equipment, other military materials, and dual-use goods and technologies (henceforth, military transfers).² Their movement may involve carriage, transit, trans-shipment and re-export across multiple jurisdictions and through different actors, engaging a range of prohibitions, authorization and licensing requirements, risk-assessment and end-use controls, diversion safeguards and other forms of State oversight.

The legality of maritime military transfers must therefore be assessed within the broader international, regional and domestic regulatory framework applicable to the goods, the parties and end-users involved, the destination and intended end-use, and the various stages and modalities of their movement.

At the international level, the Arms Trade Treaty (ATT)³ constitutes the principal multilateral treaty framework governing the international trade in conventional arms. Its provisions establish substantive limitations on the transfer, including export, import, transit, trans-shipment and brokering, of conventional arms and related items and require States Parties to maintain national control systems capable of regulating relevant transfer activities, including those involving maritime transport, and preventing diversion.

The substantive core of the ATT is constituted by the prohibitions and risk-based controls established principally by Articles 6 and 7. Article 6 prohibits certain transfers altogether. In particular, a State Party may not authorize a transfer where the transfer would violate measures adopted by the United Nations Security Council under Chapter VII of the Charter of the United Nations, including applicable arms embargoes; where it would violate the State Party's relevant international obligations; or where, at the time of authorization, the State Party has knowledge that the arms or related items would be used in the commission of genocide, crimes against humanity, grave breaches of the Geneva Conventions of 1949, attacks directed against civilians or civilian objects, or other war crimes as defined in international agreements to which the State is a Party.

¹ UNCTAD, *Global Trade Update: Policy Insights* (December 2025), available at https://unctad.org/system/files/official-document/ditcinf2025d10_en.pdf; UNCTAD, *Review of Maritime Transport 2023* (UNCTAD 2023) 55; UNCTAD Seaborn Trade Data 2026, available at <https://unctadstat.unctad.org/datacentre/>.

² E.g., Stockholm International Peace Research Institute (SIPRI), SIPRI Yearbook 2024. International arms transfers (OUP 2024) 6. For the purposes of this document, the term “dual-use items” should be understood as encompassing, but not being limited to, the items listed in Annex I to Regulation (EU) 2021/821, as well as any other dual-use items subject to authorization requirements or prohibitions on grounds of public security or human rights considerations (e.g. pursuant to Article 9 of that Regulation) and under applicable sanctions or embargo regimes.

³ Arms Trade Treaty, opened for signature on 3 June 2013, UNTS No 52373 (entered into force 24 December 2014).

Article 7 complements these prohibitions by establishing a prospective risk-assessment framework for exports. Before authorizing an export, the exporting State Party is required to assess whether the arms or relevant items could be used to undermine peace and security or could be used to commit or facilitate specified serious violations of international humanitarian law or international human rights law, as well as certain acts of terrorism and transnational organized crime. Where the requisite level of risk is established, the export must not be authorized.

This regulatory architecture is reinforced by the obligation of States Parties to establish effective national control systems. Articles 5 and 14 of the ATT require States Parties to take the measures necessary to implement and enforce the Treaty, including through the establishment, maintenance and enforcement of national control systems. Such systems should enable States to assess the risk of diversion and to adopt appropriate mitigation measures, including enhanced scrutiny of the parties involved in a transfer, the requirement of additional documentation or assurances and, where necessary, the denial of authorization.

The ATT combines categorical prohibitions with a preventive, risk-based system under which the legality of a proposed transfer depends not merely upon its formal characteristics, but also upon its foreseeable consequences, the circumstances prevailing in the recipient State and the risk of misuse or diversion.

While the ATT-based licensing requirement provides a particularly clear legal basis for State intervention, other international instruments, including the Convention on the Prevention and Punishment of the Crime of Genocide (Genocide Convention)⁴ and the International Convention on the Suppression and Punishment of the Crime of Apartheid (Apartheid Convention),⁵ may also give rise to international legal obligations relevant to the transfer of arms and other military materials. Moreover, the absence of a treaty-based framework governing a particular transfer does not, in itself, establish its lawfulness. The transfer may remain subject to obligations arising independently under general international law, including obligations reflected in peremptory norms (*jus cogens*) and customary international law.

Where applicable peremptory or customary norms give rise to an obligation upon States to prevent prohibited conduct, the discharge of that obligation cannot depend upon whether the State concerned has become party to a particular arms-control treaty. Nor can the absence of an applicable treaty-based export prohibition be treated as establishing positive permission to facilitate conduct that would engage an independent obligation under general international law.

The duty to prevent genocide provides a particularly clear illustration. A State may be bound by the Genocide Convention, and by the corresponding obligation to prevent genocide, irrespective of whether it is a Party to the ATT or other similar regional instruments. The International Court of Justice has characterized the duty to prevent as an obligation of conduct, requiring States to employ the means reasonably available to them where they are aware, or should be aware, of a

⁴ Convention on the Prevention and Punishment of the Crime of Genocide, adopted by the General Assembly of the United Nations on 9 December 1948, UNTS 2000 (entered into force 12 January 1951).

⁵ International convention on the suppression and punishment of the crime of apartheid, adopted by the General Assembly of the United Nations on 30 November 1973, UNTS 1563 (entered into force 18 July 1976).

serious risk that genocide will be committed.⁶ In such circumstances, a State could not plausibly discharge its preventive obligation while knowingly authorizing or facilitating military transfers where there is a sufficiently foreseeable and serious risk that the items concerned would contribute to the commission of genocide. The legal obligation would arise from the prohibition of genocide and the corresponding duty of prevention.⁷

The same logic applies, *mutatis mutandis*, to other serious international crimes and violations arising under applicable treaties and peremptory norms of international law, including the prohibitions of aggression, crimes against humanity, racial discrimination and apartheid, slavery, and torture, as well as the basic rules of international humanitarian law and the right to self-determination.⁸ Where a State is under an independent obligation to prevent or refrain from contributing to conduct prohibited by a peremptory or customary norm, the provision or transfer of arms, ammunition, components or other military materials may become legally relevant where the circumstances establish a sufficient nexus between the transfer and the prohibited conduct. The prohibition on aiding or assisting another State in the commission or maintenance of an internationally wrongful act, as reflected in Articles 16 and 41 of the International Law Commission's Articles on State Responsibility, may provide an additional basis for assessing the legality of State conduct, particularly where the transfer knowingly facilitates the commission or continuation of an internationally wrongful act.⁹

On 11 March 2025 the Boycott, Divestment, and Sanctions (BDS) National Committee published a legal opinion, coordinated by the Associazione di Consulenza in Diritto del Mare (ASCOMARE) and prepared by eight experts in the law of the sea.¹⁰ The opinion focused on two core legal issues of immediate relevance to States:

- ❖ the applicable legal regime governing passage through the territorial sea of vessels transporting arms and dual-use materials where such transfers are inconsistent with the ATT, the Genocide

⁶ Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina v. Serbia and Montenegro), Judgment, Merits, I.C.J. Reports 2007, para 430.

⁷ Alleged Breaches of Certain International Obligations in respect of the Occupied Palestinian Territory (Nicaragua v. Germany), Order, 30 April 2024, para 24; UN Doc A/HRC/55/L.30 (26 March 2024), para 13, 5; and UN Doc A/HRC/58/41 (9 January 2025) 3-4.

⁸ E.g., Article III of the 1973 International Convention on the Suppression and Punishment of the Crime of Apartheid; Article 2 of the 1984 Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. And the corresponding peremptory duties to prevent such crimes, as reflected, among other things, in the International Law Commission Draft Conclusions on Identification and Consequences of Peremptory Norms of General International Law (2022), Draft conclusion 23 and Annex.

⁹ ILC, Responsibility of States for Internationally Wrongful Acts, 2001. Despite their non-binding nature, they are “widely regarded as a codification of customary international law” (Arbitral Award rendered on 12 October 2005 in the case Noble Venture Inc. and Romania (ICSID Case No. ARB/01/11)). See also Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina v. Serbia and Montenegro), Judgment, Merits, I.C.J. Reports 2007, para 420.

¹⁰ Available at https://ascomare.com/wp-content/uploads/2025/03/ascomare-legal-opinion-_-innocent-passageand-due-diligence.pdf.

Convention, the Apartheid Convention, and peremptory norms of international law binding upon their flag States.

- ❖ the international responsibility of flag States for failure to exercise effective jurisdiction and control over such vessels, in violation of the 1982 UN Convention on the Law of the Sea (UNCLOS) and customary international law.

In a detailed 49-page opinion letter, the expert group concluded that:

- ❖ the transport of arms and dual-use materials used for the commission of serious international law violations directly affects the “innocent” character of passage through the territorial sea. Under Article 19 of UNCLOS and customary international law, coastal States not only possess the right, but also the duty, to prevent non-innocent passage in their territorial sea. This duty is reinforced where the underlying conduct contributes to violations of peremptory norms, including genocide, apartheid, and the acquisition of territory by force.¹¹
- ❖ flag States are required, under Article 94 of UNCLOS and customary international law, to “effectively exercise” jurisdiction and control over vessels flying their flag, including when operating in the waters of another State. This duty entails a due diligence obligation grounded in the “genuine link” between a flag State and its vessels, requiring the former to deploy adequate means, exercise its best efforts, and take all necessary measures to ensure that vessels under its registry do not contribute to genocide, apartheid, or other serious breaches of peremptory norms of international law.¹² As clarified by international courts and tribunals, including the International Tribunal for the Law of the Sea, this requires establishing and enforcing a national system, comprising legislation, administrative procedures, and enforcement mechanisms, and exercising adequate vigilance to ensure its effective operation.¹³

Building on these findings and upon request from the BDS National Committee, in November 2025 ASCOMARE and Law for Palestine developed a set of *Implementing Guidelines*,¹⁴ translating the opinion’s conclusions into operational checklists designed to assist States (whether acting as port, coastal, or flag States) in effectively fulfilling their obligations under international law. These obligations give effect to the requirement that States exercise due diligence under international law, including by:

- ❖ assessing the risk of non-compliance by vessels flying their flag, operating in their waters, or docking in their ports with international law binding upon them;
- ❖ establishing, implementing, and enforcing an adequate legal and administrative framework to monitor and ensure compliance;

¹¹ Ibid., paras 84-89.

¹² Ibid., paras 110-115 and 149-151.

¹³ Responsibilities and Obligations of States Sponsoring Persons and Entities with Respect to Activities in the Area, Advisory Opinion, ITLOS Case No 17, [2011] ITLOS Rep 10, ICGJ 449 (ITLOS 2011), 1 February 2011; Request for an advisory opinion submitted by the Sub-Regional Fisheries Commission (SRFC), Advisory Opinion, ITLOS Case No 21, ICGJ 493 (ITLOS 2015), 2 April 2015; South China Sea arbitration (Philippines v. China), Final Award, PCA Case No 2013—19, ICGJ 495 (PCA 2016), 12 July 2016; and Request for an Advisory Opinion Submitted by the Commission of Small Island States on Climate Change and International Law, ITLOS report 2024, para 235.

¹⁴ Maritime Transport of Military Materiel and Dual-Use Components Used for Genocide, Apartheid and Other Atrocity Crimes (Guidelines for Operationalising States’ Obligations Under the Law of the Sea), available at: <https://bdsmovement.net/resources/how-implement-obligations-under-law-sea-prevent-illegal-maritime-transfers-israel>.

- ❖ taking appropriate action where there are reasonable grounds to believe that a risk of noncompliance exists; and
- ❖ adopting a precautionary approach where the potential consequences of non-compliance could result in irreparable harm or disproportionate damage to the protected legal interest.

Where a State is, or should be, aware that maritime activities under its jurisdiction or control present a credible risk of contributing to serious violations of international law, that State is under an obligation to take all measures reasonably available to it to prevent such contribution. In circumstances where a high risk of contribution to serious breaches of international law is identified, the obligations of prevention and precaution may entail, as appropriate, the denial of port entry and access to port services to the vessels concerned, as well as the adoption of other measures necessary to ensure that such activities do not facilitate the commission or continuation of those breaches.

A central component of the supporting documents developed by ASCOMARE and Law for Palestine is a structured due diligence framework for Port State Control (PSC), designed to operationalize States' obligations under international law to prevent military transfers where there is a credible risk that they may facilitate serious breaches of peremptory norms, including genocide, aggression, crimes against humanity, apartheid, slavery and torture, as well as violations of fundamental rules of international humanitarian law and the right to self-determination.¹⁵ Drawing on recommendations from the Stockholm International Peace Research Institute (SIPRI)¹⁶ and the United Nations Office of the High Commissioner for Human Rights (OHCHR),¹⁷ the framework seeks to strengthen implementation of applicable transfer rules and procedures and promote harmonized risk assessments to prevent transfers prohibited under international law.¹⁸

The proposed PSC framework enables authorities to pre-identify vessels according to risk categories (Risk 1, Risk 2, Risk 3, Risk 4) prior to port entry and to adopt appropriate measures to ensure compliance with international law, including denial of entry, inspection, or seizure of cargo where warranted. Comparable risk-based systems are already widely and effectively used by States in other domains, including fisheries control, environmental protection, and maritime safety, in accordance with applicable international frameworks, including those developed under United Nations agencies, and in a manner consistent with international trade law.¹⁹

In this context, PSC assumes relevance in at least two distinct situations:

- ❖ the conduct of physical and/or documentary inspections of “authorized” transfers (post-shipment controls), with a view to detecting and substantiating potential infringements of applicable national and international legal frameworks, including prohibitions and restrictive measures.

¹⁵ See ILC's Draft Conclusions on Identification and Consequences of Peremptory Norms of General International Law (2022), Draft conclusion 23 and Annex.

¹⁶ See H. Griffiths and Michael Jenks, SIPRI Policy Paper 32 (January 2012), *Maritime Transport and Destabilising Commodity Flows*, p. 48.

¹⁷ E.g., see UN Doc A/HRC/51/15, pp. 14-16 and A/HRC/58/41, pp. 15-16.

¹⁸ See A/HRC/58/41, pp. 7-8.

¹⁹ See WTO, *Analytical Index of the General Agreement on Tariffs and Trade*, Articles XX and XXI (WTO, 1995).

- ❖ the conduct of physical and/or documentary inspections of other transfers in circumstances giving rise to a reasonable suspicion of illegal trafficking, including transfers carried out in the absence of the requisite authorization or based on invalid or improperly issued authorization.

For these purposes, risk assessment should extend beyond the initial authorization stage to include vessels bound for port. This is particularly important where compelling risk indicators or substantiated grounds suggest that a vessel may be involved in an unlawful transfer, engaging the port State's obligations under international law.



This document provides a practical, ready-to-use model for PSC aimed at the identification, prevention, and suppression of the illegal transfer, including export, import, transit, transshipment, and brokering, of conventional arms, munitions, parts and components for their assembly, other military materials, and dual-use items, when directed to, or diverted²⁰ towards, countries presenting a credible risk of committing genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other war crimes.

The proposed model also contributes to the discharge of States' due diligence obligations under, among other things, the International Covenant on Civil and Political Rights (ICCPR),²¹ the ATT and similar regional frameworks,²² the Genocide Convention, and the Apartheid Convention. It aligns with Section 2 of the *Implementing Guidelines* developed by ASCOMARE and Law for Palestine, as well as with the OHCHR 2025 report on the impact of arms transfers on human rights, which emphasizes that "States must, in each case, exercise due diligence in military transfer decision-making. That obligation is included either as a stand-alone obligation to conduct export assessments or it follows necessarily from the effective implementation of the prohibitions in question."²³

The model further contributes to the implementation of Action 15(h) of the *Pact for the Future*, adopted on 22 September 2024, calling on Member States to establish national legislation, regulations, and procedures to control international arms transfers, manage the risk of violations of international humanitarian and human rights law, and ensure consistency with their obligations under applicable international treaties.²⁴

To achieve this objective, the document sets out recommended rules, templates, and procedures relating to:

- ❖ harmonized criteria for determining a vessel's risk profile to inform the actions of port authorities (Annex I);
- ❖ a prior notification template for advance port entry (Annex II);

²⁰ As noted by the OHCHR in its 2020 report on the impact of arms transfers on human rights, "[t]here is no agreed international legal definition of diversion. In the context of arms, however, it has been defined as the movement – either physical, administrative or otherwise – of weapons and ammunition from the legal to the illicit realm, in defiance of national and/or international law, to an unauthorized end user or for unlawful end use". See UN Doc A/HRC/44/29 (19 June 2020), pp. 6-7.

²¹ As noted by the OHCHR in its 2020 report on the impact of arms transfers on human rights, "...States parties to the Covenant have a binding due diligence obligation to take appropriate measures to prevent diversion of arms that has a direct and foreseeable impact on the right to life of individuals outside their territory. They are also obligated to take appropriate legislative and other measures to prevent unregulated or illicit arms transfers that originate with arms corporations based in their territory or subject to their jurisdiction". Ibid., p. 10.

²² E.g., the 2006 ECOWAS Convention on Small Arms and Light Weapons, their ammunition, and other related materials, applicable to all ECOWAS Member States (Benin, Burkina Faso, Cabo Verde, Côte d'Ivoire, The Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Mali, Niger, Nigeria, Senegal, Sierra Leone, and Togo); and Council Common Position 2008/944/CFSP, as amended by Council Decision 2025/779, applicable to all European Union Member States (Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden).

²³ See A/HRC/58/41, p. 5.

²⁴ Available at <https://docs.un.org/en/a/res/79/1>.

- ❖ harmonized inspection and enforcement schemes and procedures (Annex III);
- ❖ a list of relevant sources for the collection of risk-assessment data (Annex IV);
- ❖ the establishment of a list of vessels presumed to have engaged in the illegal transport of arms and other prohibited materials (Annex V);
- ❖ a reference list of dual-use items (Annex VI);
- ❖ operational implementation protocol including pilot evaluation (Annex VII).

Against this background, the proposed PSC model is designed both to support the implementation of the ATT in relation to the maritime transfer of conventional arms, their ammunition and parts and components that can be used for their assembly,²⁵ and to operationalize States' broader obligations under international law concerning the transfer of other military materials, including dual-use items listed in Annex VI. Such transfers may engage States' obligations not to aid or assist other States in the commission of internationally wrongful acts, including genocide, apartheid and other serious violations of peremptory norms of general international law.²⁶

Due diligence considerations set out herein are separate from corporate human rights due diligence requirements, such as those reflected in the United Nations Guiding Principles on Business and Human Rights,²⁷ which may nonetheless serve as a normative compass to guide and assess States' obligations and actions under international law, including in respect of non-compliance by corporate entities with international rules and standards binding on the States in which those entities operate, whether on land or at sea, or are registered.²⁸

For the purposes of this document, the term "illegal transport" is used as an operational description, rather than an independent legal category. It covers (a) a transport prohibited by an international, regional or domestic rule applicable to the acting State; (b) a transport carried out without an authorization required by that rule, or contrary to its terms; and (c) conduct that, on the facts and under the applicable legal test, engages a separate obligation under international law to prevent, refrain from aiding or assisting, or avoid contributing to prohibited conduct. A credible risk that goods may be misused is a trigger for risk assessment and, where appropriate, preventive measures.

²⁵ The proposed model supports the implementation of Article 5(2) of the ATT, which requires States Parties to "establish and maintain a national control system, including a national control list, in order to implement the provisions of this Treaty". According to the ATT *Voluntary Basic Guide on Article 5*, the national control system, described as "a cornerstone of compliance with the ATT", is essential to ensure that "a State has oversight and control of transfers taking place under its jurisdiction, minimising the risks of diversion and/or illicit transfers of arms and other items." The same Guide indicates that "[t]he main components of a national control system should include a legal and regulatory basis for licensing and enforcement, a corresponding institutional framework, and administrative procedures for implementation." See Voluntary Guide to Implementing Article 5.

²⁶ UN Office of the High Commissioner for Human Rights, *Impact of arms transfers on human rights: report of the Office of the United Nations High Commissioner for Human Rights*, UN Doc A/HRC/51/15 (16 September 2022), pp. 6-7.

²⁷ UN Office of the High Commissioner for Human Rights. (2011). *Guiding Principles on Business and Human Rights*.

²⁸ See P. Leucci (ed.), *ASCOMARE Yearbook on the Law of the Sea, Volume 4* (Luglio Editore, 2025) 413 et ss.

Recommendations

1. Institutionalize structured, risk-based due diligence

States are encouraged to establish and operationalize structured, risk-based due-diligence procedures within their legal and administrative systems, using binding domestic instruments where necessary to confer powers, define duties and ensure reviewability. The procedures should enable authorities to identify possible non-compliance promptly, gather and verify relevant information, document the basis for decisions, and apply a graduated response consistent with the law applicable to the case. They should, at a minimum:

- (a) require prior notification of relevant information from vessels seeking port entry;
- (b) enable competent authorities to assign a documented screening priority to each case before arrival, distinguishing risk prioritization from a legal determination that a transfer is unlawful; and
- (c) provide for predefined enforcement responses corresponding to each risk category.

In designing and implementing these systems, States are encouraged to draw upon the operational indicators and risk-assessment methodologies set out in the Annexes to this supporting document.

Embedding these mechanisms within the domestic framework, such as marine notices, port regulations, administrative measures, or legislative acts, is essential to ensure predictability, effectiveness, and transparency.

2. Ensure immediate notification, precaution, and enforcement action

Where a risk of non-compliance with international law is identified, it is recommended to:

- (a) inform the relevant flag State without delay; and
- (b) formally request prompt and effective corrective action, consistent with Article 94 of UNCLOS and customary international law concerning the duty to effectively exercise jurisdiction and control over vessels flying its flag.

Where reasonable grounds exist to suspect non-compliance, appropriate, proportionate and lawful measures should be considered, including, where legally justified, denial of port entry, inspection of vessels and cargo already in port, seizure or restriction of cargo, and other enforcement measures consistent with international law.

A precautionary approach should guide decision-making where credible risks exist that vessel activities may contribute to genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other serious violations of international law, particularly where irreparable harm or disproportionate damage to protected legal interests may result.

3. Establish coordinated regional or international frameworks

It is recommended that concrete steps be taken toward establishing a regional or international framework to enhance PSC and structured information-sharing. Such a framework should aim to harmonize inspection and risk-assessment procedures, facilitate real-time exchange of information,

coordinate enforcement responses, and prevent forum-shopping (port State of convenience) by high-risk vessels.

The framework may build upon existing models developed under the auspices of the IMO, including the mechanisms established through the Paris, Viña del Mar, Riyadh, and Tokyo Memoranda of Understanding on Port State Control.

4. Establish a shared vessel-risk information mechanism

It is recommended to cooperate in establishing a shared vessel monitoring list, categorizing ‘confirmed’ and ‘suspected’ high-risk vessels.

The mechanism should record reasoned risk alerts concerning vessels for which sufficient and credible information indicates a possible connection to a prohibited transfer, diversion or other relevant non-compliance. Entries should distinguish unverified alerts, substantiated concerns and infringements established by a competent authority.

This mechanism may draw upon reliable sources, including documentation produced by UN bodies and civil society institutions, subject to clear evidentiary standards and procedural safeguards. Comparable listing systems already operate effectively in other domains, including the fight against illegal, unreported and unregulated (IUU) fishing.

5. Build implementation capacity and evaluate results

States are encouraged to designate a lead authority, establish inter-agency referral arrangements, train inspectors and legal officers, maintain secure case records, and review the operation of the system periodically. Pilot implementation should test the consistency of screening decisions, the timeliness of authorization checks, the quality of evidence, the handling of exculpatory information, the safeguards applied to restrictions and the costs imposed on lawful trade.

6. Diplomatic engagement on applicable legal duties and consequences

It is recommended that a (joint) Note Verbale be transmitted to the UN Secretary-General, requesting its publication in the *Law of the Sea Bulletin* and its circulation to all UN Member States at the next session of the UN General Assembly, in accordance with established practice.

The Note Verbale should recall and reaffirm the obligation of flag States to effectively exercise jurisdiction and control over vessels flying their flag, particularly where such vessels transport arms or dual-use items that may contribute to serious breaches of peremptory norms of international law.

It should further clarify that persistent State inaction in the face of clear and serious risks may engage international responsibility and expose the State concerned to proceedings before competent international courts and tribunals, including the International Tribunal for the Law of the Sea.

Proactive diplomatic engagement and structured exchanges with States that permit, or do not take adequate measures to prevent, vessels flying their flag from transporting such arms and dual-use items are also recommended.

ANNEX I – Operational template for risk assessment²⁹

For the purposes of this Annex, “high-risk countries” means countries presenting a credible risk of committing genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other war crimes.

Section 1 – Vessel identification and cargo

The table below provides a non-exhaustive list of indicators for classifying the risk level of vessels transporting arms, munitions, parts and components for their assembly, and other materials when calling at port, whether in transit or as a destination, including for the import, export, transshipment, or brokering of such items. These indicators provide the competent authorities of port States with the elements necessary to determine a vessel’s risk category in accordance with Section 2 of this Annex.

The indicators are based on four main categories of information available to competent authorities. First, information transmitted by vessels through an Advance Request of Port Entry (ARPE) – the submission of a mandatory ARPE, in line with the template set out in Annex II (“Advance Request for Port Entry”), is strongly recommended. Second, information obtained through inspections and enforcement procedures, whether conducted on land or at sea – procedures carried out in accordance with Annex III (“Inspection and Enforcement Systems”) are strongly recommended. Third, information obtained through additional requests made by the competent authorities, whether before or after port entry. Fourth, publicly available information and information obtained through information-sharing mechanisms, including those listed in Annex IV (“List of Sources Relevant for Risk Assessment”).

Category	Indicators / risk levels
1. Vessel name, type, size (LOA), IMO number (or another unique identifier)	<ul style="list-style-type: none">(a) If vessel detained in the previous 12 months for conducting business with high-risk countries: HIGH RISK(b) If vessel detained for conducting business with high-risk countries in the previous 12-36 months: STANDARD RISK(c) If vessel denied entry in port(s) of call in the previous 12 months for related violations: HIGH RISK(d) If vessel denied entry in port(s) of call in the previous 12-36 months: STANDARD RISK(e) If vessel known to have been involved in trade with high-risk countries in the previous 12 months: HIGH RISK(f) If vessel known to have been involved in trade with high-risk countries in the previous 12-36 months: STANDARD RISK(g) If vessel included in any relevant final ‘high risk’ vessels list: HIGH RISK(h) If vessel included in any relevant draft/provisional ‘high risk’ vessels list: STANDARD RISK(i) If flag hopping in the previous 12 months: HIGH RISK(j) If flag hopping in the previous 12-36 months: STANDARD RISK
1. Flag State	<ul style="list-style-type: none">(a) If suspect of poor flag State’s performance: STANDARD RISK(b) If confirmation of poor flag State’s performance: HIGH RISK(c) If the flag State is a high-risk country: HIGH RISK

²⁹ This annex is an updated version of the original published on 11 November 2025, available at <https://bdsmovement.net/resources/how-implement-obligations-under-law-sea-prevent-illegal-maritime-transfers-israel>.

	<p>(d) If vessel registered in countries suspected/confirmed of supporting high risks countries: STANDARD RISK</p> <p>(e) If vessel without nationality or assimilated to a vessel without nationality: HIGH RISK</p>
2. Flag State's certification (dual-use components) [] Yes [] No	If no flag State's certification that dual-use components will not be used for genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other war crimes: HIGH RISK
3. AIS [] Yes [] No	<p>(a) If no AIS (impossibility to track the vessel's activities), where required: HIGH RISK</p> <p>(b) If evidence that AIS was switched off without any valid reason in the previous 12 months: STANDARD RISK</p>
4. Port of departure	<p>(a) If departing from high-risk countries: HIGH RISK</p> <p>(b) If departing from countries suspected/confirmed of supporting high risks countries: STANDARD RISK</p>
5. Previous ports of call (after port of departure)	<p>(a) If docking in high-risk countries: HIGH RISK</p> <p>(b) If docking in countries suspected/confirmed of supporting high risks countries: STANDARD RISK</p>
6. Transshipments in previous ports of call (after port of departure) [] Yes [] No. *If yes, transshipment authorization and details.	<p>(a) If transshipment in high-risk countries: HIGH RISK</p> <p>(b) If transshipment in countries suspected/confirmed of supporting high risks countries: STANDARD RISK</p> <p>(c) If transshipment at sea: HIGH RISK</p> <p>(d) If no transshipment authorization: HIGH RISK</p>
7. Port of call (final destination)	<p>(a) If intended final destination in high-risk countries: HIGH RISK</p> <p>(b) If intended final destination in countries suspected/confirmed of supporting high risks countries: STANDARD RISK</p> <p>(c) If the final destination is a high-risk country within the previous 12 months: HIGH RISK</p> <p>(d) If the final destination is a high-risk country/country supporting high risk countries within the previous 12-36 months: STANDARD RISK</p>
8. Owner / Operator / Charterer	<p>(a) If there is evidence that owner (including beneficial owner), operator or charterer has conducted direct/indirect business in high-risk countries in the previous 12 months: HIGH RISK</p> <p>(b) If there is evidence that owner (including beneficial owner), operator or charterer has conducted direct/indirect business in high-risk countries in the previous 12-36 months: STANDARD RISK</p>
9. Cargo description (type, nature)	<p>(a) If cargo at least include any of the following conventional arms and ammunition/munitions, including parts or components that provide the capability to assemble them, destined to high-risk countries (HIGH RISK) or to countries suspected/confirmed of supporting high risks countries (STANDARD RISK)</p> <p>☐ Battle tanks</p> <p>☐ Armoured combat vehicles</p> <p>☐ Large-calibre artillery systems</p> <p>☐ Combat aircraft</p> <p>☐ Attack helicopters</p> <p>☐ Warships</p> <p>☐ Missiles and missile launchers</p> <p>☐ Small arms and light weapons</p> <p>(b) If cargo include other military equipment, such as explosives, incendiary or gas bombs, grenades, rockets, rocket launchers, missiles, missile systems, mines or other destructive devices: HIGH RISK</p>

	(c) If cargo include dual-use component without flag State's certification or other certification related to their end-use: HIGH RISK (d) If wrong/false/missing information on cargo type and nature: HIGH RISK (e) If incomplete information on cargo type and nature: STANDARD RISK
10. Cargo documentation provided (origin, destination / shipper, consignee): ☐ Complete ☐ Incomplete ☐ Missing	(a) If wrong/false/missing cargo documentation: HIGH RISK (b) If incomplete cargo documentation: STANDARD RISK
11. Shipper /Consignee	(a) If there is evidence that the shipper in the previous 12 months has been conducting business with high-risk countries: HIGH RISK (b) If consignee is in a high-risk country or there is evidence that, in the previous 12 months, has been conducting business with high risk: HIGH RISK
12. Intended use of the cargo	(a) If evidence cargo may be used for genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other war crimes: HIGH RISK (b) If suspect cargo may be used for genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other war crimes: STANDARD RISK (c) If intention is not stated/unclear: STANDARD RISK
13. ARPE (ex. 24h before entry)	(a) No prior notification 24h before port entry: HIGH RISK (b) Incomplete information: STANDARD RISK (c) Wrong/false/missing information reported: HIGH RISK
14. Additional information/clarification requested to the vessel	(a) No reply: STANDARD RISK (b) Incomplete information: STANDARD RISK (c) Wrong/false/missing information reported: HIGH RISK
15. Additional information/clarification requested to the flag State	(a) No reply: STANDARD RISK (b) Incomplete information: STANDARD RISK (c) Wrong/false/missing information reported: HIGH RISK
16. Other relevant information	(a) Suspected risk of non-compliance, based on evidence provided by other States, UN bodies, civil-society organizations: STANDARD RISK (b) Confirmed risk of non-compliance, based on evidence provided by other States, UN bodies, civil-society organizations: HIGH RISK

Note (1): under Article 6(3) of the ATT, "A State Party shall not authorize any transfer of conventional arms covered under Article 2(1) or of items covered under Article 3 or Article 4, if it has knowledge at the time of authorization that the arms or items would be used in the commission of genocide, crimes against humanity, grave breaches of the Geneva Conventions of 1949, attacks directed against civilian objects or civilians protected as such, or other war crimes as defined by international agreements to which it is a Party." See [Voluntary Guide to ATT Arts 6 and 7](#).

Note (2): under Article 2 of [Council Common Position 2008/944/CFSP](#), export licenses, including transit, transshipment and brokering licenses (Article 1(2)), shall be denied if, among other things, "Having assessed the recipient country's attitude towards relevant principles established by international human rights instruments, including the human rights situation in that country... there is a clear risk that the military technology or equipment to be exported might be used to commit or facilitate internal repression, serious acts of gender-based violence or serious acts of violence against women, children, or other serious violations of human rights... or where there is reason to believe that the technology or equipment will be diverted from its stated end use or end-user and be used for internal repression... Internal repression includes, inter alia, torture and other cruel, inhuman and degrading treatment or punishment, summary or arbitrary executions, disappearances, arbitrary detentions, and other serious violations of human rights and fundamental freedoms as set out in relevant international human rights instruments, including the Universal Declaration on Human Rights and the International Covenant on Civil and Political Rights. (criterion 2)". Additionally, export should be denied if "would provoke or prolong armed conflicts or aggravate existing tensions or armed conflicts within the country of final destination" (criterion 3) or "if there is a clear risk that the intended recipient would use the military technology or equipment to be exported aggressively against

another country or to assert by force a territorial claim” (criterion 4). See also [User’s Guide to Council Common Position 2008/944/CFSP](#).

Note (3): some of the criteria for risk assessment are based on risk factors already developed and applied under regional port State control agreements to ensure compliance with maritime safety, security, and environmental standards, under the auspices of the IMO, such as those listed in Annex 7 of the [Paris Memorandum of Understanding \(MoU\)](#), Annex 2 of the [Tokyo MoU](#), and Annex 2 of the [Viña del Mar MoU](#).

Note (4): risk assessment should be conducted both pre-shipment (at the authorisation stage) and post-shipment to prevent illegal trafficking. Pre-shipment assessment, linked to the nature and end-use of the cargo, should apply an integrated methodology combining multiple risk factors. E.g., where the cargo is classified as STANDARD or HIGH RISK and at least one additional factor is likewise so classified, the overall risk level should be considered STANDARD or HIGH.

Section 2 – Risk categories

The table below provides an indicative identification of risk categories based on the relevant risk indicators (High / Standard) listed in Section 1, to assist the competent authorities of port States in their risk assessment whenever one or more risk indicators are present.

RISK 1 Very high	RISK 2 High	RISK 3 Medium	RISK 4 Moderate
all or majority of high-risk indicators	equal number of high risk and standard risk indicators, or majority of standard risk indicators	all standard risk indicators (3 or more)	all standard risk indicators (less than 3)

Note (1): ideally, risk categories should inform not only the specific action to be taken in respect of each vessel category, but also the order of priority in which such action is to be undertaken.

Note (2): it is recommended that a list of vessels, organized by risk category, be established at the national, regional, or international level and be kept up to date.

ANNEX II – Advance request for port entry

Advance request for port entry (ARPE) is a critical tool for the advance collection of information needed to exercise effective due diligence and inform port authorities' decision-making regarding incoming vessels. It enables the verification and cross-checking of information for risk assessment and helps determine the appropriate course of action based on the level of risk. In line with similar practices in fisheries law (e.g., [IOTC Res. 25-11 \(2025\)](#), [CMM 08\(2020\) SIOFA](#) and [ICCAT Rec. 23-17 \(2023\)](#)), ARPE should be submitted at least 24-72 hours before port entry. The following template offers a simplified ARPE model.

SECTION A – PORT AND VOYAGE INFORMATION	
1. Port of Intended Entry:	
2. Estimated Date and Time of Arrival (UTC):	
3. Purpose of Port Call:	☐ Loading ☐ Unloading ☐ Transit ☐ Transshipment ☐ Refueling/Resupply ☐ Repairs/Maintenance ☐ Other (specify):
4. Last Port(s) of Call (last five, with dates):	
5. Next Port(s) of Call (if known):	
SECTION B – VESSEL IDENTIFICATION	
1. Vessel Name:	
2. IMO Number or Other Unique Identifier:	
3. Flag State:	
4. Call Sign:	
5. Vessel Type:	
6. Gross Tonnage:	
7. Owner(s):	
8. Operator:	
9. Charterer (if applicable):	
SECTION C – MASTER AND RESPONSIBLE PERSONS	
1. Name of Master:	
2. Nationality:	
3. Contact Details (telephone/email):	
4. Company Responsible for Cargo Documentation:	

SECTION D – CARGO INFORMATION	
1. General Description of All Cargo on Board:	Provide sufficient details to allow identification of the nature, type, composition and intended function of the goods.
2. Are you transporting any of the following items, including parts or components that provide the capability to assemble them?	☐ Conventional arms (battle tanks, armored combat vehicles, large-caliber artillery systems, combat aircraft, attack helicopters, warships, missiles and missile launchers, and small arms and light weapons) ☐ Ammunition/munitions ☐ Military equipment/components ☐ Fuel (including aviation or military-grade fuel), coal, or gas (including LNG or refined gas products)
3. If yes, provide detailed description, quantity, weight/volume, and classification references (e.g. HS codes):	
4. Country of Origin of Goods:	
5. Country of Final Destination:	
6. Declared End Use / End User (if known):	
7. Intermediate Consignees / Transshipment Points (if any):	
8. Licenses / Authorizations (reference number and issuing authority):	
9. Supporting Documentation Attached:	☐ Cargo manifest ☐ Bill of lading ☐ End-use certificate ☐ Export licenses ☐ Import authorization ☐ Insurance certificate ☐ Flag State declaration of compliance
SECTION E – DECLARATION	
<p>I hereby certify that the information provided in this notification is complete and accurate. I further declare, to the best of my knowledge and following due diligence undertaken by the vessel operator and relevant commercial parties, that the cargo has not been obtained, produced, transferred or otherwise made available in violation of applicable international law, including obligations arising under the Charter of the United Nations and other binding international instruments, and is not intended to be used in the commission of war crimes, crimes against humanity, genocide, apartheid, or other serious violations of international humanitarian law, international human rights law, or peremptory norms of international law. I understand that the submission of false, incomplete or misleading information may result in denial of port entry or other lawful measures.</p>	

Name (print):

Title / Capacity:

Signature:

Date:

ANNEX III – Inspection and enforcement system

Based on a ship's risk profile (Risk 1, Risk 2, Risk 3, or Risk 4), as determined in accordance with Annex I, and without prejudice to the discretion of the competent authorities of a port/coastal State to determine the most appropriate course of action in discharging their due diligence obligations vis-à-vis vessels posing a risk of non-compliance with binding international law and bound for their ports, this Annex sets out recommended rules and procedures for inspection and enforcement to be undertaken by competent authorities with respect to vessels identified as presenting such risks. These rules and procedures concern, in particular, compliance with requirements governing the transport of arms and other materials to countries presenting a credible risk of committing genocide, crimes against humanity, grave breaches of the Geneva Conventions, attacks against civilians or civilian objects, or other war crimes (hereinafter “high-risk countries”).

Note (1): the schemes and procedures are based, among other things, on rules already developed and applied under regional port State control agreements to ensure compliance with maritime safety, security, and environmental standards, under the auspices of the IMO, such as those listed in Annex 8 of the [Paris Memorandum of Understanding \(MoU\)](#), Annex 2 of the [Tokyo MoU](#), and Annex 2 of the [Viña del Mar MoU](#).

Note (2): the schemes and procedures are also based on rules already developed and applied within the fisheries framework, in particular those established under [Council Regulation \(EC\) No 1224/2009](#), in the context of regional fisheries management organizations (RFMOs) and arrangements, as well as for the implementation of the [Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing \(the PSMA\)](#).

Note (3): the recommended measures and procedures are without prejudice to more restrictive measures imposed under specific national or international legal frameworks, including measures such as confiscation, seizure, disposal, or arrest in cases of illegal trafficking of arms and other materials, as provided for under the [Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition](#), supplementing the United Nations Convention against Transnational Organized Crime.

Section 1 – Inspection schemes

Inspections should be carried out by properly qualified and trained persons authorized for that purpose by the competent authorities of the port State concerned and acting under its responsibility. Each inspector should carry a personal document in the form of an identity card issued by the competent authorities in accordance with the national legislation, indicating that the inspector is authorized to carry out inspections. Inspectors should conduct inspections in accordance with national and international rules, procedures and practices relating to the safety of the vessel being inspected and its crew.

Depending on the ship's risk profile (Risk 1, Risk 2, Risk 3, or Risk 4), different inspection schemes and procedures may be applied, whether on land (port State) or at sea (coastal State).

1.1 Initial inspection (Risk 3, Risk 4)

An initial inspection should consist of a visit on board the ship to verify the completeness and accuracy of certificates and other documentation related to the transported cargo, as well as other information communicated through the Advance Request of Port Entry in accordance with Annex II, including:

- ❖ verifying, to the extent possible, that the vessel identification documentation on board, as well as information relating to the ownership of the vessel, is accurate, complete, and up to date;
- ❖ verifying that the vessel's flag and markings (e.g. name, external registration number, IMO ship identification number) are consistent with the information contained in the documentation;
- ❖ verifying the accuracy and completeness of any export, import, transit, transshipment, and brokering authorizations, including those issued for the purposes of compliance with the relevant requirements set out in the United Nations Arms Trade Treaty and similar international legal instruments, as well as the consistency between reported vessel and cargo information and the relevant documentation;
- ❖ reviewing all other relevant documentation and records held on board, including, to the extent possible, those in electronic format.

The flag State of the inspected vessel should be promptly informed of any initial inspection and requested to confirm, deny, or comment on its findings, as well as on any other information relevant to the purposes of the inspection.

Initial inspections should be limited to Risk 3 and Risk 4 vessels, for which a full inspection may not be warranted in light of the assessed risk of non-compliance. Nevertheless, where the findings of the initial inspection provide inspectors with reasonable grounds to suspect or confirm that the vessel is involved in the illegal transport of arms or other materials to high-risk countries, or in any other case provided for under national or international law, they should proceed with a full inspection in accordance with Section 1.2 below.

1.2 Full inspection (Risk 1, Risk 2, Risk 3, Risk 4)

Risk 1 and Risk 2 vessels that are not denied entry to port pursuant to Section 3.1 should be subject to a full inspection. Such inspection should consist of an initial inspection in accordance with Section 1.1, followed by a detailed inspection.

The detailed inspection should cover, among other things, a thorough examination of the vessel, including:

- ❖ all relevant areas, decks, and rooms;
- ❖ any transported cargo, including, where necessary for inspection purposes, its unloading at the relevant port facilities;
- ❖ any records relevant to assessing compliance with applicable international obligations;
- ❖ the presence on board of undeclared conventional arms and ammunition/munitions, including parts or components that enable their assembly, as well as any dual-use items not accompanied by the authorizations and documentation required under national and international law;
- ❖ the use and functioning of the automatic identification system and other remote electronic monitoring systems on board.

Where, during or following a full inspection, an inspector has reasonable grounds to believe that the vessel is transporting arms and ammunition/munitions, including parts or components enabling their assembly, or other dual-use items in a manner inconsistent with national law or the international obligations binding upon the relevant coastal or port State, inspectors should promptly take one or more of the enforcement measures set out in Section 3.

The flag State of the inspected vessel should be promptly informed of any full inspection and requested to confirm, deny, or comment on its findings, as well as on any other information relevant to the purposes of the inspection.

The above provisions should also apply to Risk 3 and Risk 4 vessels that have undergone an initial inspection in accordance with Section 1.1 and for which a more detailed inspection is deemed necessary.

Section 2 – Inspection reports database and template

Inspectors should draw up an inspection report following each inspection and transmit it to the competent authorities of the coastal or port State in which the inspection was conducted. The data contained in such reports should, where possible, be recorded and transmitted by electronic means.

Where the inspection concerns a vessel registered in another State, a copy of the inspection report should be transmitted to the competent authorities of the flag State, as appropriate, in order to enable them to take any necessary measures in accordance with national and international law. A copy of the inspection report should also be provided to the master or operator of the inspected vessel.

States should establish and maintain an up-to-date electronic database in which all inspection reports prepared by their inspectors are recorded. Such data should be retained for a minimum period of three years and used for the determination of a vessel's risk profile in accordance with Annex I.

Without prejudice to applicable rules on the protection of personal and commercial data, relevant information, such as instances of denial of port entry and other identified risk factors, may be shared with other States upon request and used for the purposes of identifying and listing high-risk and standard-risk vessels in dedicated vessel lists for inspection and enforcement purposes.

To ensure harmonized collection and reporting of relevant information, the inspection report template set out below may be used:

1. GENERAL
[port name]
[port authority]
[address]
[telephone]
[email]
[inspection date and time]
[inspector name and title]

2. VESSEL INFORMATION					
Name		IMO number /other unique ID		Arrival to port (approximate time)	
Flag		Gross tonnage		Previous port(s) of call	
Type		Engine power		Next port of call	
Call sign		AIS functioning		Final destination	
Registered operator		Charterer, if any		Any other relevant information	
Pre-determined ship risk's profile, if any	☐ Risk 1 ☐ Risk 2 ☐ Risk 3 ☐ Risk 4				

3. CARGO INFORMATION			
Cargo description		Quantities loaded in previous port(s) of call, if any	
Cargo quantities and classification reference		Intermediate Consignee(s) / Transshipment Point(s), if any	
Country of origin (cargo)		Declared end / use of the cargo	
Country of final destination (cargo)		Licences / Authorisations (reference number and issuing authority)	
Supporting documentation (cargo) attached:	☐ Cargo manifest ☐ Bill of lading ☐ End-use certificate ☐ Export licence ☐ Import authorisation ☐ Insurance certificate ☐ Flag State declaration of compliance	Is the vessel transporting any of the following items, including parts, or components that provide the capability to assemble them?	☐ Conventional arms (battle tanks, armoured combat vehicles, large-calibre artillery systems, combat aircraft, attack helicopters, warships, missiles and missile launchers, and small arms and light weapons) ☐ Ammunition/munitions ☐ Military equipment/components ☐ Fuel (including aviation or military-grade fuel), coal, or gas (including LNG or refined gas products) If yes, provide detailed description, quantity,

			weight/volume, and classification references (e.g. HS codes).
Physical inspection findings, if any		Any other relevant information	

4. ADVANCE REQUEST OF PORT ENTRY (ARPE)

Was the ARPE submitted within the applicable deadlines?	
Verify ARPE information: <ul style="list-style-type: none"> ❖ does it match the information collected during the inspection? If not, record the discrepancies identified. 	

5. FLAG STATE NOTIFICATION

Request from the competent authorities of the flag State: <ul style="list-style-type: none"> ❖ confirmation of the vessel's nationality; ❖ confirmation of the validity and authenticity of the cargo documentation; ❖ confirmation that the cargo is not intended to be used for the commission of genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other war crimes; ❖ information, where available, regarding any detention of the vessel within the previous 24 months; ❖ information, where available, regarding any denial of port entry to the vessel within the previous 24 months. 	
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6. RISK FACTORS DETECTED

HIGH RISK	STANDARD RISK
☐ vessel detained in the previous 12 months for conducting business with high-risk countries	☐ vessel detained for conducting business with high-risk countries in the previous 12-36 months
☐ vessel denied entry in port(s) of call in the previous 12 months for related violations	☐ vessel denied entry in port(s) of call in the previous 12-36 months
☐ vessel known to have been involved in trade with high-risk countries in the previous 12 months	☐ vessel known to have been involved in trade with high-risk countries in the previous 12-36 months
☐ flag hopping in the previous 12 months	☐ flag hopping in the previous 12-36 months
☐ confirmation of poor flag State's performance	☐ suspect of poor flag State's performance
☐ flag State is a high-risk country	☐ vessel registered in countries suspected/confirmed of supporting high risks countries

☐ no AIS (where required)	☐ evidence that AIS was switched off without any valid reason
☐ departing from high-risk countries	☐ departing from countries suspected/confirmed of supporting high risks countries
☐ docking in high-risk countries (after port of departure)	☐ docking in countries suspected/confirmed of supporting high risks countries (after port of departure)
☐ transshipment in high-risk countries	☐ transshipment in countries suspected/confirmed of supporting high risks countries
☐ intended final destination in high-risk countries	☐ intended final destination in countries suspected/confirmed of supporting high risks countries
☐ the final destination is a high-risk country within the previous 12 months	☐ the final destination is a high-risk country/country supporting high risk countries within the previous 12-36 months
☐ evidence that owner (including beneficial owner), operator or charterer has conducted direct/indirect business in high-risk countries in the previous 12 months	☐ evidence that owner (including beneficial owner), operator or charterer has conducted direct/indirect business in high-risk countries in the previous 12-36 months
☐ cargo includes any conventional arms and ammunition/munitions, including parts or components that provide the capability to assemble them, destined to high-risk countries	☐ cargo include any conventional arms and ammunition/munitions, including parts or components that provide the capability to assemble them, destined to countries suspected/confirmed of supporting high risks countries
☐ wrong/false/missing information on cargo type and nature	☐ incomplete information on cargo type and nature
☐ wrong/false/missing cargo documentation	☐ incomplete cargo documentation
☐ evidence cargo may be used for genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other war crimes	☐ suspect cargo may be used for genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other war crimes
☐ no prior notification 24h before port entry or wrong/false information reported	☐ incomplete prior notification
☐ confirmed risk of non-compliance, based on evidence provided by other States, UN bodies, civil-society organizations	☐ suspected risk of non-compliance, based on evidence provide by other States, UN bodies, civil-society organizations
☐ transshipment at sea	☐ intended use of the cargo unknown
☐ no transshipment authorization	☐ master refused to provide additional information requested
☐ wrong/false additional information reported by the master	☐ master provided incomplete additional information requested
☐ wrong/false additional information reported by the flag State	☐ flag State refused to provide additional information requested
☐ cargo includes dual-use component without flag State's certification or other certification related to their end-use	☐ flag State provided incomplete additional information requested
☐ cargo includes other military equipment, such as explosives, incendiary or gas bombs, grenades, rockets,	☐ vessel included in any relevant draft/provisional 'high risk' vessels list

rocket launchers, missiles, missile systems, mines or other destructive devices	
☐ vessel included in any relevant final 'high risk' vessels list	☐ Other risk (provide details)
☐ there is evidence that the shipper in the previous 12 months has been conducting business with high-risk countries	
☐ consignee is in a high-risk country or there is evidence that, in the previous 12 months, has been conducting business with high risk	
☐ vessel without nationality or assimilated to a vessel without nationality	

7. PRELIMINARY FINDINGS

High risk indicators present?	
Standard risk indicators present? ❖ Please, indicate if at least 3 standard risk indicators have been identified.	
Risk category determination:	☐ Risk 1 ☐ Risk 2 ☐ Risk 3 ☐ Risk 4 ☐ Other

8. ACTION TAKEN

☐ No further action required ☐ Additional documentation requested ☐ Enhanced inspection required ☐ Cargo hold sealed pending review ☐ Vessel detained ☐ Port entry denied ☐ Other (specify)	
Any other relevant information	

9. MASTER CONSIDERATIONS

Please include any relevant observations, objections, or comments provided by the master, if any.	
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Section 3 – Port entry and enforcement scheme

Depending on the ship's risk profile or on the results of any inspection carried out in accordance with Section 1, different enforcement and preparatory enforcement actions and procedures, including those relating to port entry, may be warranted considering the circumstances of the case.

The table below provides an indicative correlation between risk categories and expected enforcement or preparatory enforcement action, to assist the competent authorities of port and coastal States in their decision-making process.

Deny of port entry	Allow entry without port services, subject to full inspection (Section 1.2)	Allow entry with port services, subject to full inspection (Section 1.2)	Allow entry with port services, subject to initial inspection (Section 1.1)	Allow entry, subject to other/not conditions (where appropriate)	Delay entry until further investigation / request of additional information	Immediate enforcement actions (Section 3.6)
Risk 1, Risk 2	Risk 1	Risk 2	Risk 3, Risk 4	Risk 4	Risk 1, Risk 2, Risk 3, Risk 4	Risk 1, Risk 2, Risk 3, Risk 4

Note (1): decisions regarding port entry and accompanying measures lie with the port State and should be taken based on available information and resources. The correlation between the expected outcomes and the risk categories set out in the table above does not take into account additional considerations that may be relevant at the time a port entry decision is made. For example, limitations in inspection or enforcement capacity may require a port State, in application of the precautionary approach, to deny port entry even to vessels classified under lower-risk categories.

3.1 Denial of port entry

Without prejudice to the entry of vessels into port in accordance with international law for reasons of force majeure or distress, Risk 1 and Risk 2 vessels should be denied entry into port where there are clear grounds to believe that the vessel is engaged in illegal conduct and/or where the circumstances of the case do not allow for a full inspection, in accordance with Section 1.2 and subject to the conditions set out in point 3.2 below. The flag State of the vessel concerned should be promptly informed of any decision to deny entry into port.

3.2 Allow port entry (with or without port services) subject to full inspection

Risk 1 and Risk 2 vessels should be allowed entry into port exclusively for the purpose of inspection (full inspection under Section 1.2) and/or for taking appropriate enforcement measures, in conformity with international law.

While in port, Risk 1 vessels should not be permitted to use the port for landing, transshipping, or for other port services, including, among other things, refueling and resupplying, maintenance, and drydocking, unless otherwise provided for under international law.

3.3 Allow port entry subject to initial inspection

Risk 3 and Risk 4 vessels, except those falling under the other conditions set out in point 3.4 below or under no condition therein, should be permitted to enter port exclusively for the purposes of conducting an inspection pursuant to Section 1.1 and/or taking appropriate enforcement measures, in accordance with international law.

3.4 Allow port entry subject to other/no conditions

Depending on the circumstances of the case and the nature and scope of the relevant risk factors, including those identified under Annex I, entry into port of Risk 4 vessels may be subject to no conditions or to conditions other than an initial inspection under Section 1.1, as provided for under national law.

3.5 Delay port entry / request additional information

Entry into port of Risk 1, Risk 2, Risk 3, and Risk 4 vessels may be reasonably delayed for the purpose of conducting a necessary on-board inspection or cross-checking the relevant information transmitted through the advance request of port entry, including the information specified in Annex II; or for requesting additional information that may be relevant to the determination of the vessel's risk profile or to inform the decision-making process prior to or during port entry.

3.6 Immediate enforcement measures

Where relevant data or information, including that collected under Section 1 or through an advance request for port entry in accordance with Annex II, leads the competent authorities of a coastal or port State to believe that a vessel is transporting arms or other materials illegally to high-risk countries, those authorities should immediately, in addition to conducting further investigations and taking any specific measures required under international law in accordance with their domestic legislation, take relevant and immediate enforcement measures, such as:

- ❖ ordering the posting of a bond;
- ❖ temporarily immobilizing the vessel, the master, and other persons on board;
- ❖ seizing the vessel or part of its cargo;
- ❖ confiscating relevant documentation;
- ❖ suspending or withdrawing any authorization or certification issued by the coastal or port State;
- ❖ taking any other measure compatible with national law, upon request of the flag State concerned.

The flag State of the vessel concerned should be promptly informed of any measures taken for the purposes of enforcement.

ANNEX IV – List of sources relevant for risk assessment

This Annex provides a non-exhaustive list of sources that States may use to collect information relevant to determining a vessel's risk profile in accordance with Annex I, including information collected under the United Nations Arms Trade Treaty (ATT).

Note (1): the list of information listed in this document is based, among other things, on Annexes A and B of the 2019 ATT Working Group on Effective Treaty Implementation Chair's Draft Report to CSP5.

Prior notification system

Information collected through an Advance Request for Port Entry, including that set out in Annex II, concerning port and voyage information (including port(s) of call and destination), vessel information, cargo information, master and/or operator information, and flag State declarations.

Inspections

Information collected through national inspection schemes and procedures, including those set out in Annex IV, concerning documentary and physical inspections, including the inspection of transported cargo, authorizations, records, and systems on board.

National records

Information collected through national records on the export, import, transit, transshipment, and brokering of conventional arms and ammunition/munitions, including parts or components enabling their assembly, as well as any prohibited dual-use items, including export records required under Article 12 of the ATT to be retained for a minimum period of 10 years, together with any accompanying documentation.

Information-sharing mechanisms

Information collected through regional or international information-sharing mechanisms, including, where available, information on:

- ❖ vessel identification (e.g. current and former flag State(s), IMO or other identification numbers);
- ❖ vessel port(s) of origin, call, and destination;
- ❖ the vessel's history of non-compliance;
- ❖ past instances of denial of entry into port;
- ❖ past inspection reports and enforcement measures;
- ❖ cargo information, including any available import, export, transit, transshipment, and brokering documentation, as well as information on end-use and intermediary consignees;
- ❖ flag State performance;
- ❖ information relating to the owner, operator, and charterer.

Such information may be shared upon request (e.g. by previous port(s) of call or the flag State) or through more structured arrangements, including information-sharing mechanisms established under the framework of the ATT.

Other resources

Information collected through publicly available documents and other relevant sources, including reports from governmental authorities, diplomatic missions, foreign governments, as well as international and regional organizations, including the optional sources listed in Annex B of the 2019 Arms Trade Treaty (ATT) Working Group on Effective Treaty Implementation Chair's Draft Report to CSP5 and other relevant sources, covering, in particular:

- ❖ sources assessing the impact of transfers on peace and security, including reports and databases from the United Nations, relevant Security Council bodies (e.g. sanctions committees and the 1540 Committee), the Center for Systemic Peace (State Fragility Index), the Institute for Economics and Peace (Global Peace Index), the International Crisis Group, and the Uppsala Conflict Data Program (UCDP), as well as relevant regional frameworks and guidelines, including those developed under the Wassenaar Arrangement and the European Union Common Position 2008/944/CFSP;
- ❖ sources relating to the risk of serious violations of international humanitarian law, including reports and guidance issued by the United Nations, the International Committee of the Red Cross (ICRC), the International Criminal Court (ICC), and non-governmental organizations such as Human Rights Watch and the Coalition to Stop the Use of Child Soldiers;
- ❖ sources relating to the risk of serious violations of international human rights law, including reports and datasets produced by the United Nations Development Programme (UNDP), the Office of the High Commissioner for Human Rights (OHCHR), the Human Rights Council (including the Universal Periodic Review), Amnesty International, Human Rights Watch, the International Commission of Jurists, and other relevant organizations and databases (e.g. CIRI, Political Terror Scale);
- ❖ sources relating to risks associated with offences under international conventions and protocols on terrorism, including information from the United Nations Security Council Counter-Terrorism Committee and the United Nations Office of Counter-Terrorism;
- ❖ sources relating to risks associated with transnational organized crime, including information from the United Nations Office on Drugs and Crime (UNODC), INTERPOL, and research bodies such as the Small Arms Survey;
- ❖ reports of United Nations panels of experts monitoring sanctions regimes, data from research institutes such as the SIPRI and the Small Arms Survey, and other specialized research bodies;
- ❖ judgments and reports of international courts and tribunals; reports from international and regional organizations operating in the recipient State; national legislation, policies, and implementation practices; reports from diplomatic missions;
- ❖ local and international media; civil society and non-governmental organization reports; national crime statistics; early warning mechanisms; and other open-source or classified information, as appropriate.

ANNEX V – List of vessels presumed to have been involved in illegal military transfers

Note (1): The measures and procedures set out in this Annex are based on applicable fisheries legislation establishing similar lists of vessels presumed to have engaged in illegal, unreported and unregulated (IUU) fishing, as well as on relevant port State measures, including those adopted under the auspices of competent regional fisheries management organizations, such as the Indian Ocean Tuna Commission (IOTC) [Resolution 06/01](#) establishing a list of vessels presumed to have carried out IUU fishing in the IOTC Area.

Article 1 of the ATT establishes the object and purpose of the Treaty, which to date has been ratified or acceded to by 118 States Parties. The Treaty seeks to “establish the highest possible common international standards for regulating or improving the regulation of the international trade in conventional arms” and to “prevent and eradicate the illicit trade in conventional arms and prevent their diversion.” Its purpose is to contribute to international and regional peace, security and stability, reduce human suffering, and promote cooperation, transparency, and responsible action by States Parties, thereby building confidence among them.

To give effect to these objectives, Articles 6 and 7 of the Treaty establish explicit prohibitions on the transfer, including export, import, transit, transshipment, and brokering,³⁰ of conventional arms, ammunition, and related parts and components. In particular, such transfers must not be authorized where a State Party has knowledge, at the time of authorization, that the arms or related items would be used to commit genocide, crimes against humanity, grave breaches of the Geneva Conventions of 1949, attacks directed against civilians or civilian objects, or other war crimes as defined by applicable international agreements.³¹

To ensure the effectiveness of these prohibitions, the Treaty requires States Parties, among other things, to:

- ❖ implement the Treaty in a consistent, objective, and non-discriminatory manner (Article 5);
- ❖ adopt and enforce appropriate national measures to give effect to its provisions (Article 14);
- ❖ cooperate and exchange information with other States Parties in support of its implementation (Article 15).

Notwithstanding these obligations, a significant proportion of transfers of arms, ammunition, and related components continues to take place by sea, with such items still reaching destinations where they are used to commit war crimes, crimes against humanity, and other serious violations of international law. In certain cases, this occurs with the knowledge, or at least the reasonably foreseeable awareness, of the States concerned, potentially in breach of Articles 6 and 7 of the Treaty.

³⁰ ATT, Article 2(2).

³¹ E.g., as defined in Article 8 of the Rome Statute of the International Criminal Court (1998).

Moreover, similar considerations arise in relation to the maritime transport of certain dual-use items destined for countries committing serious violations of international law. While such items may not always qualify as “parts and components” within the meaning of Article 4 of the ATT, their transfer may nonetheless engage the responsibility of States under international law, including the obligation not to aid or assist in the commission of genocide, apartheid, or other serious violations of peremptory norms of international law.³²

In light of the above, the establishment of a “List of vessels presumed to have been involved in illegal military transfers” (LIMT) is recommended as a practical tool to support the implementation of Articles 6 and 7 of the ATT, as well as other relevant due diligence obligations under, among other things, the Genocide Convention and the Apartheid Convention. Such a mechanism could form part of States’ risk assessment processes in relation to international arms transfers.

This mechanism would enable the identification of vessels presumed to have been involved in maritime transfers inconsistent with the legal obligations binding upon their flag States, thereby allowing States to adopt appropriate preventive or enforcement measures. Comparable mechanisms already exist in other areas of international law, including fisheries governance, environmental protection, and maritime safety, where vessel listing systems are widely used to identify high-risk operators and to trigger appropriate regulatory responses, particularly in respect of vessels calling at port.

Such tools could therefore be readily adapted or incorporated into national frameworks implementing the ATT and similar legal instruments, enabling States Parties to be promptly informed of potential non-compliance by vessels flying their flag or calling at their ports. This, in turn, would allow them to take timely action and avoid the legal and practical consequences of non-compliance with their international obligations, including reputational harm, domestic political and social pressure, litigation, and the engagement of State responsibility.

Section 1 – Establishment of the LIMT

The LIMT should be established and applied to keep record of vessels that are presumed to have engaged in the illegal transport of arms and other prohibited materials to countries presenting a credible risk of committing genocide, crimes against humanity, grave breaches of the 1949 Geneva Conventions, attacks against civilians or civilian objects, or other war crimes.

The LIMT should include information on vessels and their operators in respect of which provides clear grounds to presume involvement in such illegal transport, considering information collected in accordance with Annex IV.

³² E.g., Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina v. Serbia and Montenegro), Judgment, Merits, I.C.J. Reports 2007, paras 430-431; and Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel), Provisional Measures, Order, 26 January 2024, ICJ, para 54.

The Conference of the States Parties to the ATT could serve as a forum for the establishment of a similar mechanism, within the limits of the Treaty's mandate and in accordance with Article 17(4)(b) of the ATT.

Section 2 – LIMT rules and procedures

Rules and procedures for the submission of entries to the LIMT should be agreed by the States concerned, including the establishment of a LIMT Secretariat, a database to record and process relevant information, and the organization of a LIMT annual meeting of the participating States.

2.1 Draft LIMT

The LIMT Secretariat should prepare a Draft LIMT of vessels presumed to have engaged in the illegal transfer of arms or other prohibited materials, based on available information.

The Draft LIMT, together with supporting evidence, should be circulated to participating States and concerned flag States at least 90 days before the LIMT annual meeting.

Participating States and concerned flag States may submit comments and evidence (including exculpatory information) at least 30 days before the LIMT annual meeting.

2.2 Provisional LIMT

The LIMT Secretariat should prepare a Provisional LIMT and circulate it with supporting evidence at least two weeks before the LIMT annual meeting.

States may submit additional information at any time.

The LIMT Secretariat should review:

- ❖ the Draft and Provisional LIMT;
- ❖ all available evidence, including evidence and information submitted by the flag State to demonstrate either no involvement in illegal transfers or effective enforcement action has been taken.

The LIMT Secretariat should then prepare a revised Provisional List and recommend additions to or removals from that list within a specified time frame.

2.3 Final LIMT

Unless objected to by a two-thirds majority of the States participating in the LIMT annual meeting, the Final LIMT should be automatically adopted during that session.

Once the Final LIMT has been adopted, the LIMT Secretariat should:

- ❖ notify the flag States of the listed vessels and request them to inform the relevant owners and operators;
- ❖ publish the Final LIMT, subject to applicable confidentiality rules.

Vessels included in the Final LIMT should, by default, be classified as “HIGH RISK” for the purposes of the risk assessment conducted in accordance with Annex II, and, as such, be subject to the applicable port inspection and enforcement schemes set out in Annex III.

A vessel may be removed from the Final LIMT upon demonstration that effective control is exercised by the flag State, or that appropriate enforcement action has been taken to prevent the recurrence of illegal transfers. The flag State of any listed vessel may request its removal from the LIMT by providing relevant supporting evidence.

Removal from the List should be decided at the LIMT annual meeting by a two-thirds majority of the participating States. Participating States may establish extraordinary procedures to address urgent requests for removal.

2.4 Information to be included in the LIMT

The Draft, Provisional and Final LIMT should contain the following details:

- ❖ name of the vessel and previous name/s, if any;
- ❖ flag of the vessel and previous flag/s, if any;
- ❖ owner of the vessel and previous owner/s, including beneficial owners, if any;
- ❖ operator of the vessel and previous operator/s, if any;
- ❖ call sign of the vessel and previous call sign/s, if any;
- ❖ IMO number or another unique vessel identifier;
- ❖ date the vessel was first included on the Vessels List
- ❖ photographs of the vessel, where available;
- ❖ summary of the activities which justify inclusion of the vessel on the List, together with references to all relevant supporting documents and evidence.

ANNEX VI - Reference list of dual-use items

This Annex provides illustrative, user-oriented lists of dual-use items, drawing on existing international and regional frameworks governing dual-use goods, strategic goods and restrictive measures. In particular, it takes as a reference point the items listed in Annex I to Regulation (EU) 2021/821, together with additional dual-use items subject to authorization requirements or prohibitions on public security or human rights grounds, including under Article 9 of that Regulation. It also draws on comparable listing mechanisms, including the United Kingdom Department for Business and Trade's *UK Strategic Export Control List* (16 December 2025) and the Republic of Singapore's *Strategic Goods (Control) Order 2025* (S 660/2025), Division 2 (List of Dual-Use Goods).

Energy commodities, including crude oil, petroleum products, natural gas and coal, together with related extraction, processing and transport technologies, are likewise recognized as items of strategic significance. Such items may contribute, directly or indirectly, to military capabilities, security operations or their financing and are therefore included within the scope of this instrument. Relevant precedents include Annex XXIII to Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilizing the situation in Ukraine, as last amended by Commission Implementing Regulation (EU) 2026/124 of 14 January 2026.

Section 1 – Nuclear materials, facilities and equipment

<p>1A – Systems, equipment and components, as follows:</p> <p>(1) nuclear reactors and specially designed or prepared equipment and components.</p>	<p>Examples of sources that classify these items as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 0, 0A001, pp. 28-29. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Category 0, 0A001. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 0, 0A001, pp. 101-102.
<p>1B – Test, inspection and production equipment, as follows:</p> <p>(1) plants for the separation of isotopes of natural uranium, depleted uranium or special fissile materials, and specially designed or prepared equipment and components thereof;</p>	<p>Examples of sources that classify these items as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the

<p>(2) specially designed or prepared auxiliary systems, equipment and components as follows, for isotope separation plants, made of or protected by materials resistant to corrosion by UF₆;</p> <p>(3) plants for the conversion of uranium and equipment specially designed or prepared thereof;</p> <p>(4) plants for the production or concentration of heavy water, deuterium and deuterium compounds and specially designed or prepared equipment and components thereof;</p> <p>(5) plants specially designed for the fabrication of nuclear reactor fuel elements and specially designed or prepared equipment thereof;</p> <p>(6) plant for the reprocessing of irradiated nuclear reactor fuel elements, and specially designed or prepared equipment and components thereof;</p> <p>(7) plant for the conversion of plutonium and equipment specially designed or prepared thereof.</p>	<p>list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 0, 0B001-0B007, pp. 30-46.</p> <ul style="list-style-type: none"> ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Category 0, 0B001-0B007. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 0, 0B001-0B007, pp. 103-116.
<p>1B – Materials, as follows:</p> <p>(1) natural uranium or depleted uranium or thorium in the form of metal, alloy, chemical compound or concentrate and any other material containing one or more of the foregoing;</p> <p>(2) special fissile materials;</p> <p>(3) deuterium, heavy water (deuterium oxide) and other compounds of deuterium, and mixtures and solutions containing deuterium;</p> <p>(4) graphite;</p> <p>(5) specially prepared compounds or powders for the manufacture of gaseous diffusion barriers, resistant to corrosion by UF₆ (e.g. nickel or alloys containing 60% by weight or more nickel, aluminium oxide and fully fluorinated hydrocarbon polymers).</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 0, 0C001-0C005, pp. 46-47. ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 0, 0C001-0C005. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 0, 0C001-0C005, pp. 117-118.
<p>1C – Software and technology specially designed or modified for the development, production or use of goods listed above.</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025)

	<p>C(2025) 5947 final, Category 0, 0D001 and 0E001, p. 48.</p> <ul style="list-style-type: none"> ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 0, 0D001 and 0E001. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 0, 0D001 and 0E001, p. 119.
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Section 2 – Special materials and related equipment

<p>2A – Components, structures and equipment, as follows:</p> <ol style="list-style-type: none"> (1) components made from fluorinated compounds; (2) composite structures and laminates; manufactures of non-"fusible" aromatic polyimides in film, sheet, tape or ribbon; (3) protective and detection equipment and components not specially designed for military use; (4) body armour and components thereof; (5) equipment and devices used in relation to explosive or energetic materials, e.g.: <ol style="list-style-type: none"> (a) equipment specially designed or modified for the disposal of Improvised Explosive Devices (IEDs), and specially designed components and accessories thereof; (b) equipment and devices, specially designed to initiate charges and devices containing energetic materials by electrical means). (6) charges, devices and components; (7) resaturated pyrolysed carbon-carbon components designed for space launch vehicles or sounding rockets; (8) composite structures (other than those mentioned prior) in the form of thin-walled tubes; (9) wet-proofed platinised catalysts; (10) specialised packings used in separating heavy water from ordinary water; (11) high-density (lead glass or other) radiation shielding windows. 	<p>Examples of sources that classify these items (or some of them) as "dual-use items":</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 1, 1A001-1A227, pp. 49-58. ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 1, 1A001-1A227. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 1, 1A001-1A227, pp. 120-129.
<p>2B – Test, inspection and production equipment, as follows:</p> <ol style="list-style-type: none"> (1) equipment designed for the production of composite structures or laminates or fibrous or filamentary materials, as well as its components and accessories; 	<p>Examples of sources that classify these items (or some of them) as "dual-use items":</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European

<ul style="list-style-type: none"> (2) equipment designed to produce metal alloy powder or particulate materials; (3) tools, dies, moulds or fixtures, for superplastic forming or diffusion bonding titanium, aluminium or their alloys; (4) equipment (other than that specified prior) for the production of structural composites, as well as its components and accessories; (5) metal powder production equipment (other than that specified prior) and components; (6) equipment (other than that mentioned prior) for the production of propellant and propellant constituents, and specially designed components thereof; (7) specially designed nozzles for producing pyrolytically derived materials formed on a mould, mandrel or other substrate from precursor gases; (8) batch mixers and their components; (9) continuous mixers and their components; (10) fluid energy mills usable for grinding or milling substances and their components; (11) filament winding machines (other than those and related equipment; (12) electrolytic cells for fluorine production; (13) electromagnetic isotope separators designed for, or equipped with, single or multiple ion sources; (14) hydrogen-cryogenic distillation columns; (15) pumps capable of circulating solutions of concentrated or dilute potassium amide catalyst in liquid ammonia; (16) tritium facilities or plants, and equipment thereof; (17) turboexpanders or turboexpander-compressor sets; (18) lithium isotope separation facilities or plants, and systems and equipment thereof; (19) high explosive containment vessels, chambers, containers and other similar containment devices designed for the testing of high explosives or explosive devices; (20) target assemblies and components for the production of tritium. 	<p>Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 1, 1B001-1B235, pp. 58-68.</p> <ul style="list-style-type: none"> ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 1, 1B001-1B235. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 1, 1B001-1B235, pp. 129-139.
<p>2C – Materials, as follows:</p> <ul style="list-style-type: none"> (1) materials specially designed for absorbing electromagnetic radiation, or intrinsically conductive polymers; (2) metal alloys, metal alloy powder and alloyed materials; (3) magnetic metals, of all types and of whatever form; (4) uranium titanium alloys or tungsten alloys with a matrix based on iron, nickel or copper; 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 1, 1C001-1C513, pp. 69-125.

<ul style="list-style-type: none"> (5) superconductive composite conductors; fluids and lubricating materials; (6) ceramic powders, ceramic-matrix composite materials and precursor materials; (7) non-fluorinated polymeric substances; unprocessed fluorinated compounds; (8) fibrous or filamentary materials; (9) metals and compounds; (10) other materials (plutonium and previously separated neptunium-237 in any form); (11) materials and devices for reduced observables such as radar reflectivity, ultraviolet/infrared signatures and acoustic signatures (other than those specified prior) usable in missiles, missile subsystems or unmanned aerial vehicles. (12) resaturated pyrolysed carbon-carbon materials designed for space launch vehicles; (13) graphite and ceramic materials (other than those mentioned prior); (14) propellants and constituent chemicals for propellants (other than those specified prior); (15) maraging steels, useable in missiles; (16) materials for the fabrication of missiles components; (17) titanium-stabilised duplex stainless steel; (18) elemental boron, compounds, mixtures containing boron, manufactures thereof, waste or scrap of any of the foregoing; (19) tungsten, tungsten carbide, and alloys containing more than 90% tungsten by weight; (20) calcium; (21) magnesium; (22) bismuth; (23) beryllium metal, alloys containing more than 50% beryllium by weight, beryllium compounds, manufactures thereof, and waste or scrap of any of the foregoing; (24) hafnium metal, alloys containing more than 60% hafnium by weight, hafnium compounds containing more than 60% hafnium by weight, manufactures thereof, and waste or scrap of any of the foregoing; (25) Helium-3 (^3He), mixtures containing helium-3, and products or devices containing any of the foregoing; (26) elemental lithium, alloys, compounds, mixtures containing lithium, manufactures thereof, waste or scrap of any of the foregoing; (27) zirconium; (28) tritium, tritium compounds, mixtures containing tritium and products or devices containing any of the foregoing; (29) radionuclides; (30) radium-226, radium-226 alloys, radium-226 compounds, mixtures containing radium-226, manufactures thereof, and products or devices 	<ul style="list-style-type: none"> ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 1, 1C001-1C513. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 1, 1C001-1C450, pp. 140-193.
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<p>containing any of the foregoing; chlorine trifluoride;</p> <p>(31) high explosives;</p> <p>(32) nickel powder and porous nickel metal (other than those specified prior);</p> <p>(33) rhenium, and alloys containing 90% by weight or more rhenium, as well as alloys of rhenium and tungsten containing 90% by weight or more of any combination of rhenium and tungsten;</p> <p>(34) chemicals used as precursors for toxic chemical agent and chemical mixtures;</p> <p>(35) human and animal pathogens and toxins;</p> <p>(36) genetic elements and genetically-modified organisms;</p> <p>(37) plant pathogens;</p> <p>(38) toxic chemicals and toxic chemical precursors and chemical mixtures containing one or more thereof;</p> <p>(39) high-entropy alloy or refractory metal and alloy powders having a surface modified with inoculants.</p>	
<p>2D – Software, as follows:</p> <p>(1) software specifically designed to develop, product and use the materials above;</p> <p>(2) software for the development of organic matrix, metal matrix or carbon matrix laminates or composites;</p> <p>(3) software specially designed or modified to enable equipment to perform the functions of equipment mentioned above;</p> <p>(4) software specially designed or modified for the operation or maintenance of goods mentioned above;</p> <p>(5) software specially designed for analysis of reduced observables such as radar reflectivity, ultraviolet/infrared signatures and acoustic signatures.</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 1, 1D001-1D201, p. 126. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 1, 1D001-1D201. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 1, 1D001-1D201, p. 193.
<p>2E – Technology, as follows:</p> <p>(1) technology for the development, production and use of the goods, materials, equipment and software mentioned above;</p> <p>(2) technology for the regulation of temperature, pressure or atmosphere in autoclaves or hydroclaves, when used for the production of composites or partially processed composites;</p> <p>(3) technology for the production of pyrolytically derived materials formed on a mould, mandrel or other substrate from precursor gases which decompose in the 1 573 K (1 300°C) to 3 173</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 1, 1E001-1E203, pp. 127-129. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I –

<p>K (2 900°C) temperature range at pressures of 130 Pa to 20 kPa;</p> <p>(4) other technology, e.g.:</p> <p>(a) technology for the development or production of polybenzothiazoles or polybenzoxazoles;</p> <p>(b) technology for the development or production of fluoroelastomer compounds containing at least one vinyl ether monomer;</p> <p>(c) technology for the design or production of the following ceramic powders or non-composite ceramic materials;</p> <p>(d) technology for the installation, maintenance or repair of materials mentioned above;</p> <p>(e) technology for the repair of composite structures, laminates or materials mentioned above;</p> <p>(f) libraries specially designed or modified to enable equipment to perform the functions of equipment mentioned above.</p>	<p>List of dual-use items, Category 1, 1E001-1E203.</p> <p>❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 1, 1E001-1E203, pp. 194-196.</p>
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Section 3 – Materials processing

<p>3A – Systems, equipment and components, as follows:</p> <p>(1) anti-friction bearings, bearing systems and components;</p> <p>(2) radial ball bearings (other than those mentioned prior);</p> <p>(3) crucibles made of materials resistant to liquid actinide metals;</p> <p>(4) valves.</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <p>❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 2, 2A001-2A226, pp. 130-132.</p> <p>❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 2, 2A001-2A226.</p> <p>❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 2, 2A001-2A226, pp. 197-199.</p>
<p>3B – Test, inspection and production equipment, as follows:</p> <p>(1) machine tools and any combination thereof, for removing (or cutting) metals, ceramics or composites, which can be equipped with electronic devices for numerical control;</p> <p>(2) numerically controlled optical finishing machine tools equipped for selective material removal to produce non-spherical optical surfaces;</p> <p>(3) numerically controlled machine tools, specially designed for the shaving, finishing, grinding or</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <p>❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 2, 2B001-2B510, pp. 133-175.</p> <p>❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I –</p>

<p>honing of hardened spur, helical and double-helical gears;</p> <p>(4) hot isostatic presses and their components and accessories;</p> <p>(5) equipment specially designed for the deposition, processing and in-process control of inorganic overlays, coatings and surface modifications for specific substrates specified and by processes, and specially designed automated handling, positioning, manipulation and control components thereof;</p> <p>(6) dimensional inspection or measuring systems, equipment, position feedback units and electronic assemblies;</p> <p>(7) robots and specially designed controllers and end-effectors;</p> <p>(8) compound rotary tables and tilting spindles, specially designed for machine tools;</p> <p>(9) spin-forming machines and flow-forming machines, which can be equipped with numerical control units or a computer control;</p> <p>(10) isostatic presses (other than those mentioned prior);</p> <p>(11) chemical vapour deposition furnaces (other than those mentioned prior) designed or modified for the densification of carbon-carbon composites;</p> <p>(12) flow-forming machines (other than those mentioned prior) usable in the production of propulsion components and equipment (e.g. motor cases and interstages) for missiles, and specially designed components;</p> <p>(13) vibration test systems, equipment and components thereof;</p> <p>(14) equipment and process controls (other than those mentioned prior) designed or modified for densification and pyrolysis of structural composite rocket nozzles and re-entry vehicle nose tips;</p> <p>(15) balancing machines and related equipment;</p> <p>(16) positioning tables (equipment capable of precise rotary positioning in any axes), other than those mentioned prior;</p> <p>(17) centrifuges capable of imparting accelerations greater than 100 g and designed or modified to incorporate slip rings or integrated non-contact devices capable of transferring electrical power, signal information, or both;</p> <p>(18) machine tools and any combination thereof (other than those mentioned prior) for removing or cutting metals, ceramics or composites, which can be equipped with electronic devices for simultaneous contouring control in two or more axes;</p> <p>(19) dimensional inspection machines, instruments or systems (other than those mentioned prior);</p>	<p>List of dual-use items, Category 2, 2B001-2B510.</p> <p>❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 2, 2B001-2B352, pp. 199-242.</p>
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<p>(20) flow forming machines, spin forming machines capable of flow forming functions, (other than those mentioned prior), and mandrels;</p> <p>(21) centrifugal multiplane balancing machines;</p> <p>(22) remote manipulators;</p> <p>(23) controlled atmosphere (vacuum or inert gas) induction furnaces and power supplies thereof;</p> <p>(24) vacuum or other controlled atmosphere metallurgical melting and casting furnaces and related equipment;</p> <p>(25) rotor fabrication or assembly equipment, rotor straightening equipment, bellows-forming mandrels and dies;</p> <p>(26) pressure transducers capable of measuring absolute pressures;</p> <p>(27) vacuum pumps;</p> <p>(28) high-velocity gun systems;</p> <p>(29) bellows-sealed scroll-type compressors and bellows-sealed scroll-type vacuum pumps;</p> <p>(30) chemical manufacturing facilities, equipment and components;</p> <p>(31) toxic gas monitors and monitoring systems and their dedicated detecting components, as well as detectors, sensor devices and replaceable sensor cartridges thereof;</p> <p>(32) biological manufacturing and handling equipment;</p> <p>(33) additive manufacturing equipment, designed to produce metal or metal alloy components, and specially designed components thereof.</p>	
<p>3C – Software, as follows:</p> <p>(1) software specifically designed to develop, product and use the equipment mentioned above</p> <p>(2) software for electronic devices, even when residing in an electronic device or system, enabling such devices or systems to function as a numerical control unit, capable of co-ordinating simultaneously more than four axes for contouring;</p> <p>(3) software, designed or modified for the operation of equipment mentioned above, that converts optical design, workpiece measurements and material removal functions into numerical control commands to achieve the desired workpiece form;</p> <p>(4) software specially designed for nucleic acid assemblers and synthesisers, that is capable of designing and building functional genetic elements from digital sequence data.</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 2, 2D001-2D352, pp. 175-176. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 2, 2D001-2D352. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 2, 2D001-2D352, pp. 242-244.
<p>3D – Technology, as follows:</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p>

<p>(1) technology for the development, production and use of the goods, equipment and software mentioned above;</p> <p>(2) other technology, e.g.:</p> <p>(a) technology for metal-working manufacturing processes;</p> <p>(b) technology for the development or production of hydraulic stretch-forming machines and dies thereof, for the manufacture of airframe structures;</p> <p>(c) technology for the development of integration software for incorporation of expert systems for advanced decision support of shop floor operations into numerical control units;</p> <p>(d) technology for the application of inorganic overlay coatings or inorganic surface modification coatings to non-electronic substrates.</p> <p>(3) technology, not specified elsewhere, for the development or production of coating systems, designed to protect ceramic matrix composite materials from corrosion, and designed to operate at temperatures exceeding 1 373,15 K (1 100°C).</p>	<ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 2, 2E001-2E503, pp. 177-179. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 2, 2E001-2E503. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 2, 2E001-2D301, pp. 245-247.
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Section 4 – Electronics

<p>4A – Systems, equipment and components, as follows:</p> <p>(1) electronic items, e.g.:</p> <p>(a) integrated circuits;</p> <p>(b) microwave or millimetre wave items;</p> <p>(c) acoustic wave devices and components;</p> <p>(d) electronic devices and circuits containing components, manufactured from superconductive materials, specially designed for operation at temperatures below the critical temperature of at least one of the superconductive constituents;</p> <p>(e) high energy devices;</p> <p>(f) rotary input type absolute position encoders;</p> <p>(g) solid-state pulsed power switching thyristor devices and thyristor modules, using either electrically, optically, or electron radiation controlled switch methods;</p> <p>(h) solid-state power semiconductor switches, diodes, or modules;</p> <p>(i) intensity, amplitude, or phase electro-optic modulators.</p> <p>(2) general purpose electronic assemblies, modules and equipment;</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 3, 3A001-3A504, pp. 198-246. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 3, 3A001-3A504. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 3, 3A001-3A234, pp. 260-307.
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<ul style="list-style-type: none"> (3) spray cooling thermal management systems; (4) other electronic equipment, devices and components; (5) thermal batteries designed or modified for missiles; (6) frequency changers or generators; (7) high-power direct current power supplies; (8) high-voltage direct current power supplies; (9) switching devices; (10) high-current pulse generators; (11) high-speed pulse generators, and pulse heads thereof; (12) neutron generator systems, including tubes; (13) multipoint initiation systems; mass spectrometers; (14) triplines to provide low inductance path to detonators; (15) cryogenic cooling systems and components. 	
<p>4B – Test, inspection and production equipment, as follows:</p> <ul style="list-style-type: none"> (1) equipment for the manufacturing of semiconductor devices or materials and specially designed components and accessories thereof; (2) test equipment specially designed for testing finished or unfinished semiconductor devices and specially designed components and accessories thereof; (3) equipment for the manufacturing of semiconductor devices or materials and specially designed components and accessories thereof; (4) scanning electron microscope equipment designed for imaging semiconductor devices or integrated circuits; (5) cryogenic wafer probing equipment. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 3, 3B001-3B504, pp. 247-255. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 3, 3B001-3B504. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 3, 3B001-3B002, pp. 308-312.
<p>4C – Materials, as follows:</p> <ul style="list-style-type: none"> (1) hetero-epitaxial materials; (2) resist materials; (3) organo-inorganic compounds; (4) hydrides of phosphorus, arsenic or antimony even diluted in inert gases or hydrogen; (5) high resistivity materials; (6) materials consisting of a substrate among those qualifiable as high resistivity materials with at least one epitaxial layer of silicon carbide, gallium nitride, aluminium nitride, aluminium gallium nitride, gallium oxide or diamond; (7) epitaxial materials; (8) fluorides, hydrides, or chlorides, of silicon or germanium; (9) silicon, silicon oxides, germanium or germanium oxides. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 3, 3C001-3C509, pp. 256-258. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 3, 3C001-3C509. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025,

	Division 2 – List of Dual-Use Goods, Category 3, 3C001-3C006, pp. 312-314.
<p>4D – Software, as follows:</p> <ol style="list-style-type: none"> (1) software specifically designed to develop, product and use the equipment mentioned above; (2) computational lithography software specially designed for the development of patterns on EUV-lithography masks or reticles; (3) software specially designed to restore normal operation of a microcomputer, microprocessor microcircuit or microcomputer microcircuit within 1 ms after an Electromagnetic Pulse (EMP) or Electrostatic Discharge (ESD) disruption, without loss of continuation of operation; (4) Electronic Computer-Aided Design (ECAD) software specially designed for the development of integrated circuits having any Gate-All-Around Field-Effect Transistor (GAAFET) structure; (5) software specially designed to enhance or release the performance of frequency changers or generators; (6) 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. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 3, 3D001-3D507, pp. 259-260. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 3, 3D001-3D507. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 3, 3D001-3D225, pp. 314-316.
<p>4E – Technology, as follows:</p> <ol style="list-style-type: none"> (1) technology for the development, production and use of the equipment and software mentioned above; (2) technology employed for other purposes, e.g. <i>inter alia</i>: (a) technology for the development or production of a microprocessor microcircuit, microcomputer microcircuit or microcontroller microcircuit core (b) technology, in the form of codes or keys, to enhance or release the performance of frequency changers or generators; (c) technology required for the slicing, grinding and polishing of silicon wafers; (d) technology for the development or production of acuum microelectronic devices, hetero-structure semiconductor electronic devices, superconductive electronic devices. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 3, 3E001-3D505, pp. 261-264. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 3, 3E001-3D505. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 3, 3E001-3E225, pp. 316-320.

Section 5 – Computers

<p>5A – Systems, equipment and components, as follows:</p> <ol style="list-style-type: none"> (1) electronic computers and related equipment; (2) digital computers, electronic assemblies, and related equipment thereof; (3) systolic array, neutral and optical computers and specially designed related equipment, electronic assemblies and components thereof; (4) systems, equipment, and components thereof, specially designed or modified for the generation, command and control, or delivery of intrusion software; (5) analogue computers, digital computers or digital differential analysers, which are ruggedized and designed or modified for use in space launch vehicles or sounding rockets; (6) hybrid computers specially designed for modelling, simulation or design integration of space launch vehicles or sounding rockets; (7) quantum computers and related electronic assemblies and components thereof; (8) computers, electronic assemblies, and components containing one or more integrated circuits. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 4, 4A001-4A507, pp. 265-270. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 4, 4A001-4A507. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 4, 4A001-4A102, pp. 321-325.
<p>5B – Software, as follows:</p> <ol style="list-style-type: none"> (1) software specifically designed to develop, product and use the equipment mentioned above; (2) software specially designed or modified for the generation, command and control, or delivery of intrusion software. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 4, 4D001-4D004, p. 271. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 4, 4D001-4D004. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 4, 4D001-4D004, pp. 325-326.
<p>5C – Technology, as follows:</p> <ol style="list-style-type: none"> (1) technology for the development and of the equipment or software mentioned above; (2) technology for the development of intrusion software. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 4, 4E001, p. 272.

	<ul style="list-style-type: none"> ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 4, 4E001. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 4, 4E001, p. 327.
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Section 6 – Telecommunications and information security

<p>6A – Systems, equipment and components, as follows:</p> <ol style="list-style-type: none"> (1) telecommunications systems, equipment, components and accessories; (2) telemetry and telecontrol equipment, including ground equipment, designed or modified for missiles; (3) information security systems, equipment and components; (4) systems, equipment and components, for non-cryptographic information security; (5) systems, equipment and components for defeating, weakening or bypassing information security. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 5, Part 1, 5A001-5A101, pp. 275-282 and Part 2, 5A002-5A004, 295-304. ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 5, Part 1, 5A001-5A101 and Part 2, 5A002-5A004. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 5, Part 1, 5A001-5A101, pp. 330-338 and Part 2, 5A002-5A004, pp. 348-358.
<p>6B – Test, inspection and production equipment, as follows:</p> <ol style="list-style-type: none"> (1) telecommunications test, inspection and production equipment, components and accessories; (2) information security test, inspection and production equipment. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 5, Part 1, 5B001, p. 283 and Part 2, 5B002, p. 305. ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 5, Part 1, 5B001 and Part 2, 5B002. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 5, Part 1, 5B001, pp. 338-339 and Part 2, 5B002, pp. 358-359.

<p>6C – Software, as follows:</p> <ol style="list-style-type: none"> (1) software specifically designed to develop, product and use the equipment mentioned above; (2) software specially designed or modified to provide characteristics, functions or features of equipment; (3) software specially designed or modified for the development of telecommunication transmission or switching equipment; (4) software specially designed or modified for monitoring or analysis for law enforcement purposes; (5) software having the characteristics of a cryptographic activation token; (6) software having the characteristics of, or performing or simulating the functions of the equipment above. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 5, Part 1, 5D001-5D101, pp. 284-286 and Part 2, 5D002, pp. 305-306. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 5, Part 1, 5D001-5D101 and Part 2, 5D002. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 5, Part 1, 5D001-5D101, pp. 339-341 and Part 2, 5D002, pp. 359-360.
<p>6D – Technology, as follows:</p> <ol style="list-style-type: none"> (1) technology for the development, production and use of the equipment, functions or features and software mentioned above; (2) technology required for the development or production of telecommunications equipment specially designed to be used on board spacecraft; (3) technology for the development or use of laser communication techniques with the capability of automatically acquiring and tracking signals and maintaining communications through exoatmosphere or sub-surface (water) media; (4) technology for the development of digital cellular radio base station receiving equipment whose reception capabilities that allow multi-band, multi-channel, multi-mode, multi-coding algorithm or multi-protocol operation can be modified by changes in software; (5) technology for the development of spread spectrum techniques, including frequency hopping techniques; (6) technology for the development or production of equipment employing a laser, equipment employing optical switching and having a switching time less than 1 ms, radio equipment and mobile equipment; (7) technology for the development or production of Monolithic Microwave Integrated Circuit 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 5, Part 1, 5E001-5E101, pp. 286-292 and Part 2, 5E002, p. 306. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 5, Part 1, 5E001-5E101 and Part 2, 5E002. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 5, Part 1, 5E001-5E101, pp. 342-346 and Part 2, 5E002, p. 360.

<p>(MMIC) amplifiers specially designed for telecommunications;</p> <p>(8) technology for the development or production of electronic devices and circuits, specially designed for telecommunications and containing components manufactured from superconductive materials, specially designed for operation at temperatures below the critical temperature of at least one of the superconductive constituents;</p> <p>(9) technology having the characteristics of a cryptographic activation token.</p>	
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Section 7 – Sensors and lasers

<p>7A – Systems, equipment and components, included as follows:</p> <p>(1) acoustic systems, equipment and components;</p> <p>(2) optical sensors or equipment and components thereof;</p> <p>(3) cameras, systems or equipment, and components thereof;</p> <p>(4) optical equipment and components;</p> <p>(5) lasers (other than those already mentioned prior) components and optical equipment, amplifiers and oscillators;</p> <p>(6) magnetometers, magnetic gradiometers, intrinsic magnetic gradiometers, underwater electric field sensors, compensation systems, and specially designed components thereof;</p> <p>(7) gravity meters (gravimeters), their components and gravity gradiometers;</p> <p>(8) radar systems, equipment and assemblies, and specially designed components thereof;</p> <p>(9) radiation hardened detectors (other than those already mentioned prior), specially designed or modified for protecting against nuclear effects (e.g. electromagnetic pulse (EMP), X-rays, combined blast and thermal effects) and usable for missiles, designed or rated to withstand radiation levels which meet or exceed a total irradiation dose of 5 x 10⁵ rads (silicon);</p> <p>(10) photomultiplier tubes;</p> <p>(11) velocity interferometers;</p> <p>(12) pressure sensors.</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 6, 6A001-6A226, pp. 307-376. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 6, 6A001-6A226. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 6, 6A001-6A226, pp. 361-434.
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<p>7B – Test, inspection and production equipment, as follows:</p> <ol style="list-style-type: none"> (1) masks and reticles, specially designed for optical sensors; (2) optical equipment, e.g.: <ol style="list-style-type: none"> (a) equipment for measuring absolute reflectance (b) equipment other than optical surface scattering measurement equipment, having an unobscured aperture of more than 10 cm, specially designed for the non-contact optical measurement of a non-planar optical surface figure (profile) to an "accuracy" of 2 nm or less (better) against the required profile; (3) equipment to produce, align and calibrate land-based gravity meters; (4) pulse radar cross-section measurement systems; (5) systems (other than those mentioned prior) specially designed for radar cross section measurement usable for missiles and their subsystems. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 6, 6B002-6B108, p. 376. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 6, 6B002-6B108. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 6, 6B002-6B108, p. 435.
<p>7C – Materials, as follows:</p> <ol style="list-style-type: none"> (1) optical sensor materials; (2) optical materials; (3) laser materials. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 6, 6C002-6C005, pp. 377-379. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 6, 6C002-6C005. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 6, 6C002-6C005, pp. 436-438.
<p>7D – Software, as follows:</p> <ol style="list-style-type: none"> (1) software specifically designed to develop, product and use of the equipment and goods mentioned above; (2) software which processes post-flight, recorded data, enabling determination of vehicle position throughout its flight path, specially designed or modified for missiles; 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 6, 6D001-6D203, pp. 379-383.

<p>(3) Other software, e.g.:</p> <p>(a) software employed in relation to acoustic beams and data;</p> <p>(b) software designed or modified for cameras incorporating focal plane arrays and designed or modified to remove a frame rate restriction and allow the camera to a determined exceed the frame rate;</p> <p>(c) software specially designed to maintain the alignment and phasing of segmented mirror systems consisting of mirror segments;</p> <p>(d) software employed in relation to electric and magnetic fields;</p> <p>(e) software specially designed to correct motional influences of gravity meters or gravity gradiometers;</p> <p>(f) air traffic control software;</p> <p>(g) software for the design or production of radomes.</p>	<ul style="list-style-type: none"> ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 6, 6D001-6D203. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 6, 6D001-6D203, pp. 442-443.
<p>7E – Technology, as follows:</p> <p>(1) technology for the development, production and use of the equipment, materials and software mentioned above</p> <p>(2) technology, in the form of codes or keys, to enhance or release the performance of cameras or imaging devices;</p> <p>(3) other technology, e.g.:</p> <p>(a) technology required for the coating and treatment of optical surfaces;</p> <p>(b) technology for the fabrication of optics using single point diamond turning techniques;</p> <p>(c) technology required for the development, production or use of specially designed diagnostic instruments or targets in test facilities for SHPL testing or testing or evaluation of materials irradiated by SHPL beams.</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 6, 6E001-6E203, pp. 383-384. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 6, 6E001-6D203. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 6, 6E001-6E203, pp. 442-443.

Section 8 – Navigation and avionics

<p>8A – Systems, equipment and components, as follows:</p> <p>(1) accelerometers and specially designed components thereof;</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025)
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<p>(2) gyros or angular rate sensors and specially designed components thereof, including gyros usable in missiles;</p> <p>(3) inertial measurement equipment or systems;</p> <p>(4) star trackers and components thereof;</p> <p>(5) satellite navigation system receiving equipment;</p> <p>(6) airborne altimeters;</p> <p>(7) underwater sonar navigation systems;</p> <p>(8) linear accelerometers (other than those mentioned prior) designed for use in inertial navigation systems or in guidance systems of all types, usable in missiles and specially designed components thereof;</p> <p>(9) instrumentation, navigation equipment and systems (other than those mentioned prior) and specially designed components thereof, e.g.:</p> <p>(a) inertial measurement equipment or systems, using accelerometers or gyros;</p> <p>(b) integrated flight instrument systems which include gyrostabilisers or automatic pilots, designed or modified for use in missiles;</p> <p>(c) integrated navigation systems designed or modified for missiles;</p> <p>(d) three axis magnetic heading sensors, designed or modified to be integrated with flight control and navigation systems (other than those mentioned prior) and specially designed components thereof.</p> <p>(10) gyro-astro compasses and other devices (other than those mentioned prior) which derive position or orientation by means of automatically tracking celestial bodies or satellites and specially designed components thereof;</p> <p>(11) receiving equipment for navigation satellite systems (other than those mentioned prior) and specially designed components thereof;</p> <p>(12) altimeters (other than those mentioned prior) of radar or laser radar type, designed or modified for use in space launch vehicles or sounding rockets;</p> <p>(13) passive sensors for determining bearing to specific electromagnetic source (direction finding equipment) or terrain characteristics, designed or modified for use in space launch vehicles or sounding rockets;</p>	<p>C(2025) 5947 final, Category 7, 7A001-7A117, pp. 385-396.</p> <p>❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 7, 7A001-7A117.</p> <p>❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 7, 7A001-7A117, pp. 444-456.</p>
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<p>(14) flight control systems and servo valves, designed or modified for use in space launch vehicles sounding rockets specified or missiles;</p> <p>(15) guidance sets usable in missiles.</p>	
<p>8B – Test, inspection and production equipment, as follows:</p> <ol style="list-style-type: none"> (1) test, calibration or alignment equipment, specially designed for the navigation and avionics equipment mentioned above; (2) equipment specially designed to characterize mirrors for ring laser gyros; (3) equipment specially designed for the production of the navigation and avionics equipment mentioned above; (4) reflectometers specially designed to characterise mirrors, for laser gyros; (5) production facilities and production equipment, e.g.: <ol style="list-style-type: none"> (a) production facilities specially designed for the navigation and avionics equipment mentioned above; (b) production equipment and other test, calibration and alignment equipment (other than that mentioned prior) designed or modified to be used with the navigation and avionics equipment mentioned above. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 7, 7B001-7B103, pp. 397-398. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 7, 7B001-7B103. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 7, 7B001-7A103, pp. 456-458.
<p>8C – Software, as follows:</p> <ol style="list-style-type: none"> (1) software specifically designed to develop, product and use of the equipment mentioned above; (2) source code for the operation or maintenance of any inertial navigation equipment; (3) source code incorporating the navigation and avionics development technology specified below; (4) software specially designed to decrypt satellite navigation system ranging code designed for government use; (5) integration software; (6) software specially designed for modelling or simulation of the guidance sets mentioned above or for their design integration with space launch vehicles or sounding rockets; (7) software specially designed or modified for the operation or maintenance of the guidance sets mentioned above; 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 7, 7D001-7D104, pp. 398-401. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 7, 7D001-7D104. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 7, 7D001-7D104, pp. 458-461.

<p>(8) other software, e.g.:</p> <p>(a) software specially designed or modified to improve the operational performance or reduce the navigational error of systems;</p> <p>(b) source code for hybrid integrated systems which improves the operational performance or reduces the navigational error of systems;</p> <p>(c) Computer-Aided-Design (CAD) software specially designed for the development of active flight control systems, helicopter multi-axis fly-by-wire or fly-by-light controllers or helicopter circulation-controlled anti-torque or circulation-controlled direction control systems.</p>	
<p>8D – Technology, as follows:</p> <p>(1) technology for the development, production and use of the equipment and software mentioned above;</p> <p>(2) technology for the repair, refurbishing or overhaul of equipment mentioned above;</p> <p>(3) technology for protection of avionics and electrical subsystems against electromagnetic pulse and electromagnetic interference hazards, from external sources;</p> <p>(4) technology for the integration of the flight control, guidance, and propulsion data into a flight management system for optimisation of rocket system trajectory;</p> <p>(5) other technology, e.g.:</p> <p>(a) technology for the development or production of air data systems, three dimensional displays for aircraft, electric actuators, flight control optical sensor array and DBRN systems;</p> <p>(b) development technology for active flight control systems;</p> <p>(c) technology for the development of helicopter systems.</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 7, 7E001-7E104, pp. 401-406. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 7, 7E001-7E104. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 7, 7E001-7E104, pp. 462-467.

Section 9 – Marine

<p>9A – Systems, equipment and components, as follows:</p> <p>(1) submersible vehicles and surface vessels;</p> <p>(2) marine systems, equipment and components, e.g.:</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025)
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<ul style="list-style-type: none"> (a) systems, equipment and components, specially designed or modified for submersible vehicles and designed to operate at depths exceeding 1 000 m; (b) systems specially designed or modified for the 'automated control' of the motion of submersible vehicles mentioned above, using navigation data and having closed loop servo-controls; (c) fibre optic pressure hull penetrators; (d) underwater vision systems; (e) light systems specially designed or modified for underwater use; (f) robots specially designed for underwater use, controlled by using a dedicated computer; (g) remotely controlled articulated manipulators specially designed or modified for use with submersible vehicles; (h) air independent power systems specially designed for underwater use; (i) propellers, power transmission systems, power generation systems and noise reduction systems and related equipment; (j) pump jet propulsion systems; (k) underwater swimming and diving equipment (rebreathers); (l) diver deterrent acoustic systems specially designed or modified to disrupt divers. 	<p>C(2025) 5947 final, Category 8, 8A001-8A002, pp. 407-416.</p> <ul style="list-style-type: none"> ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 8, 8A001-8A002. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 8, 8A001-8A002, pp. 468-476.
<p>9B – Test, inspection and production equipment, as follows:</p> <ul style="list-style-type: none"> (1) water tunnels designed for measuring acoustic fields generated by a hydro-flow around propulsion system models. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 8, 8B001, p. 417. ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 8, 8B001. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 8, 8B001, p. 476.
<p>9C – Materials, as follows:</p> <ul style="list-style-type: none"> (1) syntactic foam designed for underwater use. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending

	<p>Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 8, 8C001, p. 417.</p> <ul style="list-style-type: none"> ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 8, 8C001. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 8, 8C001, pp. 476-477.
<p>9D – Software, as follows:</p> <ol style="list-style-type: none"> (1) software specifically designed to develop, product and use of the equipment and materials mentioned above; (2) specific software specially designed or modified for the development, production, repair, overhaul or refurbishing (re-machining) of propellers specially designed for underwater noise reduction. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 8, 8D001-8D002, p. 417. ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 8, 8D001-8D002. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 8, 8D001-8D002, p. 477.
<p>9E – Technology, as follows:</p> <ol style="list-style-type: none"> (1) technology for the development and production of the equipment and materials mentioned above; (2) other technology, e.g.: <ol style="list-style-type: none"> (a) technology for the development, production, repair, overhaul or refurbishing (re-machining) of propellers specially designed for underwater noise reduction; (b) technology for the overhaul or refurbishing of equipment mentioned above; (c) technology for the development or production of surface-effect vehicles (fully skirted variety), s surface-effect vehicles (rigid sidewalls), hydrofoil vessels with active systems for automatically controlling foil systems, small waterplane area vessels. 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 8, 8E001-8E002, pp. 417-418. ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 8, 8E001-8E002. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 8, 8E001-8E002, pp. 477-478.

Section 10 – Aerospace and propulsion

<p>10A – Systems, equipment and components, as follows:</p> <ol style="list-style-type: none"> (1) aero gas turbine engines; (2) marine gas turbine engines designed to use liquid fuel; (3) specially designed assemblies or components, incorporating the technologies specified below, for aero gas turbine engines; (4) space launch vehicles, spacecraft, spacecraft buses, spacecraft mission equipment, spacecraft on-board systems or equipment, terrestrial equipment, air-launch platforms and sub-orbital craft; (5) liquid rocket propulsion systems; (6) systems and components, specially designed for liquid rocket propulsion systems; (7) solid rocket propulsion systems and their components; (8) hybrid rocket propulsion systems and their specially designed components, systems and structures, for launch vehicles, launch vehicle propulsion systems or spacecraft; (9) ramjet, scramjet or combined cycle engines, and specially designed components thereof; (10) unmanned aerial vehicles (UAVs), unmanned airships, related equipment and components; (11) turbojet and turbofan engines (other than those mentioned prior); (12) turboprop engine systems specially designed for unmanned aerial vehicles and specially designed components thereof; (13) sounding rockets; (14) liquid propellant rocket engines or gel propellant rocket motors; (15) systems or components (other than those mentioned prior) specially designed for liquid rocket propulsion or gel propellant rocket systems; (16) solid propellant rocket motors, usable in complete rocket systems or unmanned aerial vehicles; (17) components (other than those mentioned prior) specially designed for solid and hybrid rocket propulsion systems; (18) hybrid rocket motors and specially designed components; 	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 9, 9A001-9A350, pp. 419-438. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 9, 9A001-9A350. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 9, 9A001-9A350, pp. 479-497.
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<p>(19) composite structures, laminates and manufactures thereof (other than those mentioned prior), specially designed for use in missiles or the subsystems;</p> <p>(20) pulse jet or detonation engines, usable in missiles or unmanned aerial vehicles and specially designed components thereof;</p> <p>(21) launch support equipment;</p> <p>(22) re-entry vehicles, usable in missiles and equipment designed or modified thereof;</p> <p>(23) staging mechanisms, separation mechanisms, and interstages, usable in missiles;</p> <p>(24) devices to regulate combustion usable in engines, which are usable in missiles or unmanned aerial vehicles</p> <p>(25) individual rocket stages, usable in complete rocket systems or unmanned aerial vehicles;</p> <p>(26) liquid or gel propellant tanks (other than those mentioned prior) specially designed for propellants, including liquid or gel propellants, used in rocket systems;</p> <p>(27) umbilical and interstage electrical connectors specially designed for missiles, space launch vehicles or sounding rockets;</p> <p>(28) spraying or fogging systems, specially designed or modified for fitting to aircraft, lighter-than-air vehicles or unmanned aerial vehicles, and specially designed components thereof.</p>	
<p>10B – Test, inspection and production equipment, as follows:</p> <p>(1) manufacturing equipment, tooling or fixtures;</p> <p>(2) on-line (real time) control systems, instrumentation (including sensors) or automated data acquisition and processing equipment;</p> <p>(3) equipment specially designed for the "production" or test of gas turbine engine brush seals and specially designed components or accessories thereof;</p> <p>(4) tools, dies or fixtures, for the solid-state joining of "superalloy", titanium or intermetallic aerofoil-to-disk combinations for gas turbine engines;</p> <p>(5) acoustic vibration test equipment and specially designed quartz heaters thereof;</p> <p>(6) equipment specially designed for inspecting the integrity of rocket motors and using Non-</p>	<p>Examples of sources that classify these items (or some of them) as "dual-use items":</p> <ul style="list-style-type: none"> ❖ European Commission, 'Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 9, 9B001-9B117, pp. 439-444. ❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 9, 9B001-9B117. ❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 9, 9B001-9B117, pp. 498-503.

<p>Destructive Test (NDT) techniques other than planar x-ray or basic physical or chemical analysis;</p> <p>(7) direct measurement wall skin friction transducers;</p> <p>(8) tooling specially designed for producing gas turbine engine powder metallurgy rotor components;</p> <p>(9) equipment specially designed for the production of items for unmanned aerial vehicles (UAVs), unmanned airships, related equipment and components;</p> <p>(10) aerodynamic test facilities usable for 'missiles' and their subsystems;</p> <p>(11) environmental chambers and anechoic chambers;</p> <p>(12) aerothermodynamic test facilities, usable for missiles, missile rocket propulsion systems, and re-entry vehicles and equipment;</p> <p>(13) specially designed production equipment for aerospace and propulsion systems, sub-systems and components;</p> <p>(14) specially designed production facilities for space launch vehicles or the aerospace and propulsion systems, sub-systems, and components specified above.</p> <p>(15) test benches or test stands for solid or liquid propellant rockets or rocket motors.</p>	
<p>10C – Materials, as follows:</p> <p>(1) insulation material in bulk form and "interior lining" for rocket motor cases usable in "missiles" or specially designed for solid propellant rocket engines;</p> <p>(2) resin impregnated fibre prepregs and metal coated fibre preforms thereof, for composite structures, laminates and manufactures, made either with organic matrix or metal matrix utilising fibrous or filamentary reinforcements.</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 9, 9C108-9C110, p. 445. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 9, 9C108-9C110. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 9, 9C108-9C110, pp. 503-504.
<p>10D – Software, as follows:</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p>

<ol style="list-style-type: none"> (1) software specifically designed to develop, product and use the equipment, goods and technology mentioned either above or below; (2) software incorporating technology specified below and used in “FADEC Systems” for systems or equipment specified above; (3) software specially designed or modified for the operation of items specified above; (4) software specially designed for modelling, simulation or design integration of the space launch vehicles, sounding rockets or missiles", or subsystems; (5) software specially designed or modified for the operation or maintenance of subsystems or equipment mentioned above; (6) software specially designed or modified to coordinate the function of more than one subsystem, in space launch vehicles or sounding rockets; (7) other software, e.g.: <ol style="list-style-type: none"> (a) 2D or 3D viscous software, validated with wind tunnel or flight test data required for detailed engine flow modelling; (b) software for testing aero gas turbine engines, assemblies or components; (c) software specially designed to control directional solidification or single crystal material growth in equipment mentioned above; (d) software specially designed or modified for the operation of items for unmanned aerial vehicles (UAVs), unmanned airships, related equipment and components; (e) software specially designed to design the internal cooling passages of aero gas turbine blades, vans and tip shrouds; (f) software" having specially designed to predict aero thermal, aeromechanical and combustion conditions in aero gas turbine engines, and theoretical modelling predictions of the aero thermal, aeromechanical and combustion conditions, which have been validated with actual aero gas turbine engine (experimental or production) performance data. 	<ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items’ (8 September 2025) C(2025) 5947 final, Category 9, 9D001-9D105, pp. 446-448. ❖ Department for Business and Trade of the United Kingdom, ‘UK Strategic Export Control List’ (16 December 2025), Annex I – List of dual-use items, Category 9, 9D001-9D105. ❖ Republic of Singapore, ‘Strategic Goods (Control) Order 2025’, (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 9, 9C108-9D105, pp. 504-507.
<p>10E – Technology, as follows:</p>	<p>Examples of sources that classify these items (or some of them) as “dual-use items”:</p> <ul style="list-style-type: none"> ❖ European Commission, ‘Annex to the Commission Delegated Regulation amending

<p>(1) technology for the development, production and use of the equipment, software, goods and vehicles mentioned above;</p> <p>(2) other technology, e.g.:</p> <p>(a) technology required for the development or production of gas turbine engine components or systems;</p> <p>(b) technology required for the development or production of Wind tunnel aero-models equipped with non-intrusive sensors capable of transmitting data from the sensors to the data acquisition system, or composite propeller blades or propfans;</p> <p>(c) technology required for manufacturing cooling holes in gas turbine engine components;</p> <p>(d) technology required for the development or production of helicopter power transfer systems or tilt rotor or tilt wing aircraft power transfer systems;</p> <p>(e) technology for the development or production of reciprocating diesel engine ground vehicle propulsion systems;</p> <p>(f) technology required for the production of specially designed components for high output diesel engines;</p> <p>(g) technology required for the development or production of high output diesel engines for solid, gas phase or liquid film (or combinations thereof) cylinder wall lubrication and permitting operation to temperatures exceeding 723 K (450°C);</p> <p>(h) technology for gas turbine engine "FADEC systems";</p> <p>(i) technology for gas turbine engine adjustable flow path systems designed to maintain engine stability for gas generator turbines, fan or power turbines, or propelling nozzles;</p> <p>(j) technology required for the development of wing-folding systems designed for fixed-wing aircraft powered by gas turbine engines;</p> <p>(k) technology, not mentioned prior, required for the development of components or systems, specially designed for aero gas turbine engines to enable aircraft to cruise at Mach 1 or greater for more than 30 minutes.</p>	<p>Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items' (8 September 2025) C(2025) 5947 final, Category 9, 9E001-9E102, pp. 449-458.</p> <p>❖ Department for Business and Trade of the United Kingdom, 'UK Strategic Export Control List' (16 December 2025), Annex I – List of dual-use items, Category 9, 9E001-9E102.</p> <p>❖ Republic of Singapore, 'Strategic Goods (Control) Order 2025', (2025) S 660/2025, Division 2 – List of Dual-Use Goods, Category 9, 9E001-9D102, pp. 507-519.</p>
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Section 11 – Oil, gas and charcoal

<p>11A – Equipment, technology and goods usable in oil refining and the liquefaction of natural gas, as follows:</p> <ol style="list-style-type: none"> (1) cryogenic pumps in the LNG-process; (2) process units for gas cooling in the LNG-process; (3) atmospheric-vacuum crude distillation units (CDU); (4) process units for the separation and fractionation of the hydrocarbons in the LNG-process; (5) cold boxes in the LNG-process; (6) cryogenic exchangers in the LNG-process; (7) process units for the liquefaction of the natural gas; (8) hydrogen recovery and purification technology; (9) refinery fuel gas treatment and sulphur recovery technology (including amine scrubbing units, sulphur recovery units, tail gas treatment units); (10) cooling towers and similar plant for direct cooling (without a separating wall) by means of recirculated water; (11) alkylation and isomerization units; (12) aromatic hydrocarbon production units; (13) catalytic reforming / cracker units; (14) delayed cokers; (15) flexicoking units; (16) hydrocracking reactors; (17) hydrocracking reactor vessels; (18) hydrogen generation technology; (19) hydrotreatment technology/units; (20) naphtha isomerisation units; (21) polymerisation units; (22) sulphur production units; (23) sulphuric acid alkylation and sulphuric acid regeneration units; (24) thermal cracking units; (25) [toluene and heavy aromatics] transalkylation units; (26) visbreakers; (27) vacuum gas oil hydrocracking units; (28) solvent de-asphalting units. 	<p>These equipment, technology and goods are included in Annex XXIII of Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine (OJ L 229 31.7.2014) – as lastly modified by Commission Implementing Regulation (EU) 2026/124 of 14 January 2026 amending Council Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine – whose Article 3b(1) states: "It shall be prohibited to sell, supply, transfer, or export, directly or indirectly, goods and technology suited for use in oil refining and liquefaction of natural gas, as listed in Annex X [...]"</p>
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<p>10B – Materials, including <i>inter alia</i>:</p> <ul style="list-style-type: none"> (1) acyclic hydrocarbons; (2) cyclic hydrocarbons; (3) halogenated derivatives of hydrocarbons; (4) Sulphonated, nitrated or nitrosated derivatives of hydrocarbons, whether or not halogenated; (5) wood and articles of wood, as well as wood charcoal; (6) Gaseous hydrocarbons, liquified, n.e.s. 	<p>These materials are included in Annex XXIII of Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine (OJ L 229 31.7.2014) – as lastly modified by Commission Implementing Regulation (EU) 2026/124 of 14 January 2026 amending Council Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine –, whose Article 3k(1) states: "It shall be prohibited to sell, supply, transfer or export, directly or indirectly, goods which could contribute in particular to the enhancement of Russian industrial capacities, whether or not originating in the Union, as listed in Annex XXIII [...]".</p>
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ANNEX VII – Operational implementation protocol

This Annex provides competent authorities with a practical checklist for putting the Toolkit's procedures into operation. It identifies the national arrangements to establish, the steps to follow for each case, and the records to keep.

For manageability, participating States may initially prioritize merchant vessels of 90 meters or more in length overall for routine ARPE-based screening. This is a proposed pilot-prioritization choice, not an international legal threshold. It must not prevent authorities from screening a smaller vessel or taking action where credible information, a controlled cargo, a sanctions alert or another potential legal trigger raises concern. States should record any scope rule and review whether it causes relevant cases to be missed.

Section 1 – National arrangements

Before handling live cases, each participating State should adopt or formally designate the legislative and/or administrative instruments needed to run the procedure. Use existing rules where they provide sufficient authority; amend legislation where a required duty or power does not exist.

Role	Minimum responsibility
Lead authority	Formally designates roles and decision-makers, maintains the contact roster and checks that the procedure is applied consistently.
ARPE intake officer	Receives and time-stamps the ARPE, opens the case ID and checks completeness. If no ARPE is received when required, opens a case from other available arrival or alert information.
Screening officer	Verifies core vessel/cargo facts, checks available authoritative records, applies Annex I and flags possible prohibitions or preventive-obligation triggers.
Case coordinator	Tracks deadlines, obtains responses, coordinates referrals, follows up on decisions and keeps the case record complete. May be the ARPE intake officer in routine cases if formally assigned.
Competent decision authority	Takes decisions reserved to it by national law, including, as applicable, port entry, service restrictions, authorisation suspension, cargo restrictions, detention or seizure.
Authorised inspector	Conducts documentary or physical inspections within the authority granted and records findings. Requests technical assistance where item classification, tracking or evidence handling requires specialist expertise.
Legal, custom and record contacts	Legal services advise on applicable rules and thresholds. Customs, export-control, sanctions, maritime, coast guard and law-enforcement contacts are involved as relevant. The record owner manages access, retention, security and correction of case information.

Note: Roles are functions, not necessarily separate people. A trained ARPE intake officer may also screen and coordinate routine cases if formally assigned. In urgent or multi-agency cases, the lead authority should confirm a case coordinator and the competent decision authority. Intake, screening and coordination do not confer powers reserved by law to another authority.

Section 2 – Standard Operating Procedure (SOP)

Step / timing	Responsible role	Action	Record / output
1. Receive notice or identify case	ARPE intake officer	On receipt, create a case ID and time-stamp the material. If an ARPE required by national rules has not arrived, open a case from arrival/port-call information, record the omission and contact the vessel/agent.	Case ID; ARPE or source alert; intake checklist; missed-deadline record where relevant.
2. Check scope	Screening officer	Apply the national pilot scope, including any initial 90-metre LOA prioritisation. If the vessel falls outside the routine pilot scope but credible information or a possible legal trigger is present, refer it through the designated route rather than closing it solely on size.	Scope decision and reason; any out-of-scope referral.
3. Verify core facts	Screening officer	Ideally within four working hours of a complete notice, check IMO/identity, current and former names/flags as relevant, owner/operator/charterer, cargo and quantities, route, consignee/end user, licence details and end-use documents. Cross-check authoritative records where available.	Sources and timestamps; verified/unverified fields; discrepancies and information requested.
4. Risk assessment	Screening officer (ideally, supported by custom and legal services)	Apply Annex I and assign the risk category under the nationally adopted method. Record contradictory and exculpatory information.	Risk category and rationale.
5. Identify appropriate response	Case coordinator / Authorised inspector (ideally, supported by custom and legal services)	Apply the Annex III port-entry, inspection, and enforcement route based on the risk category and circumstances.	Named decision-maker; legal basis; deadline; route under Annex III; interim measure, if any, and review point.
6. Make and communicate the decision	Competent decision authority (ideally, supported by the case coordinator)	Record separately the legal/preventive response, port-entry/service decision, any cargo-movement restriction, any authorisation action, and any detention/seizure or enforcement referral. Explain reasons, duration, notifications and review.	Written reasoned decision(s); legal provisions; scope/duration; notifications; review route; inspection report and required copies.
7. Close, review and update	Case coordinator (ideally, supported by the record owner)	Record the outcome and follow-up. Update risk information where justified; correct or remove inaccurate, expired or unsupported alerts. Review urgent open cases each working day during the pilot.	Closure code; follow-up tasks; case/database update; correction/removal log; lesson for pilot review.

Section 3 – Six-month pilot

The timetable and service targets below are proposals for testing the procedure, not international legal deadlines. Adapt them to traffic volumes and national arrangements. If too few relevant cases arise, use tabletop exercises as supplementary evidence and do not report them as live cases.

Phase	When	Owner	Actions	Done when
0. Set up	Weeks 1–4	Lead authority, legal services and participating agencies	Complete legal-basis/powers matrix; formally assign roles and alternates; approve the SOP; test secure records and urgent contacts; train staff.	Signed-off SOP; completed matrix; contact roster; tested case record; training completed.
1. Tabletop test	Weeks 5–6	Lead authority and exercise team (in line with SOP)	Run between three and five test-cases in one or more designated ports.	Exercise report; each gap assigned to an owner and correction deadline.
2. Live operation	Months 2–5	Pilot ports and relevant national authorities	Apply the procedure to all cases within the adopted pilot scope, including missing/late ARPE and referrals from other sources. Escalate legal triggers immediately; review urgent open cases each working day and hold weekly case reviews.	Complete case files; weekly issue log; monthly statistics; documented corrections.
3. Evaluate	Month 6	Review team with legal and operational expertise, preferably not handling the sampled cases	Review every potential legal-trigger or restrictive-measure case and a sample of routine closures. Compare decisions across ports; examine outcomes, delays, corrections and procedural safeguards.	Evaluation report; proposed changes, training/resource needs, and recommendation to continue, expand or revise.

The following evaluation indicators are proposed for consideration during the pilot period:

Indicator	Purpose
Time from ARPE / alert to initial screening	Tests whether cases are opened and screened promptly; urgent triggers are assessed immediately, irrespective of the routine target.
Time to verify licences, item classification and sanctions	Tests access to authoritative records and inter-agency cooperation.
Legal-trigger referrals and resulting actions	Shows whether potential prohibitions/preventive obligations reach the competent authority and whether the decision is recorded; not a quota.
Risk categories changed after verification	Identifies weak indicators and tests whether new or exculpatory information is reflected.
Measures imposed, duration and review outcome	Tests legal basis, necessity, timeliness, proportionality and access to review.
Missing/late ARPE and false-information cases	Tests whether the procedure detects and consistently handles notification failures and material misstatements.
Data corrections, expired alerts and staffing costs	Tests record quality, review discipline and operational sustainability.

