

UK Government Unveils 2024 Export Control Trends: Essential Insights and Implications for Businesses

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The UK's Export Control Joint Unit (ECJU) of the Department for Business and Trade (DBT) <u>published strategic export controls statistics for 2024</u>. As a reminder, the ECJU issues (or manages) five types of export control/trade licences:

- SIELs (standard individual export licences): These are licences granted to exporters for the shipment of specific goods to a specific end user and destination. Each SIEL is valid for a single transaction or a set quantity of goods.
- OIELs (open individual export licences): These licences allow exporters to make multiple shipments of specified goods to specified destinations or end users over a set period, rather than requiring a new licence for each shipment.
- OGELs (open general export licences): This is a type of licence that allows exporters to export specified goods to specified
 destinations without having to apply for a standard licence each time. Exporters must register to use an OGEL and comply
 with its terms and conditions.
- SITCLs (standard individual trade control licences): These are licences required for the trade (not export) of controlled goods, such as brokering or arranging the transfer of goods between two overseas countries. Each SITCL covers a specific transaction
- OITCLs (open individual trade control licences): These licences allow for multiple trade control activities (such as brokering) involving specified goods and destinations, similar to OIELs but for trade controls rather than export.

The statistics show a number of interesting trends:

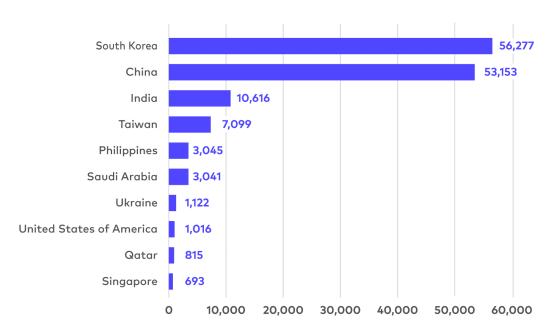
- SIELs remain the most common licence type issued, and in 2024, there were:
 - $\circ~$ 11,343 SIELs issued (a decrease of 5% from the 12,032 SIELs issued in 2023)
 - o 1,490 OGEL registrations
 - o 289 OIELs issued
 - 109 SITCLs issued
 - o 5 OITCLs issued
- The largest number of licences were issued for equipment and software with information security capability (i.e., software or hardware that leverages encryption): Equipment and software with information security capability was the top category of nonmilitary goods in terms of the number of permanent standard SIELs issued in 2024, with a total of 1,325 licences issued. This category is broad and captures a wide range of software and hardware, including items having information security as their primary function and certain digital communication or network systems, as well as certain computers, software specifically designed for the development of the aforementioned items and cryptographic activation tokens.

Following equipment and software with information security capability, the largest numbers of permanent standard SIELs issued in 2024 were for nonmilitary firearms, imaging cameras, human and animal pathogens and toxins, chemical manufacturing facilities, and equipment and components.

- In 2024, more decisions were reached within the first 20 working days but still fell short of target processing times:
 - 60% of SIEL applications were completed within 20 working days, an increase from 52% in 2023.
 - 84% of SIEL applications were completed within 60 working days from the date of application, down from 87% in 2023.
 - This falls short of the target of processing 70% of SIEL applications within 20 working days and 99% within 60 working
- Increased value of SIELs compared to 2023: The total value of all SIELs issued in 2024 was 143 billion pounds, up from 70.3 billion pounds in 2023. However, the ECJU pointed out that a handful of high-value licences often explain peaks in the

data. For example, only 54 licences for information security equipment and software all for a single exporter accounted for 46.9 billion pounds.

- Number of issued licences remains much higher than those refused or rejected: In 2024, 95% of decisions on SIELs were decisions to issue a SIEL and only 5% were refusals (none were revoked). The number of SIEL refusals was nevertheless above average, at 600 SIEL refusals in 2024 compared to the 304 annual average number of refusals between 2008 and 2023.
- Majority of licence refusals associated with China as a destination: The majority of refusals were for licences to export to China, particularly in relation to the new military end-use controls and the addition of China to the list of destinations subject to those military end-use controls.
- US in eighth place of end-user destinations by value of licences: The top end-user destination by value of licences issued for exportation of strategic goods under 'permanent standard' SIELs in 2024 was South Korea (56.3 billion pounds worth of goods), followed by China (53.2 billion pounds) and India (10.6 billion pounds). The US is in eighth place with 1,016 million pounds. In terms of destinations by number of licences, the US is in second place, with 756 permanent standard SIELs in 2024, behind China with 808 licences in 2024.



Value of Issued Permanent Standard SIELS in 2024, € millions

Top 10 end-user destinations licensed in terms of licence values, 2024 (<u>UK Department for Business and Trade – Official Statistics 2024</u>). Contains public sector information licensed under the Open Government Licence v3.0.

Overall, these statistics point to a dynamic environment in which exporters must be vigilant. Monitoring governmental guidance, maintaining a well-documented internal compliance program and seeking early engagement with the ECJU – especially for complex or high-value transactions – can improve the likelihood of timely, successful licensing outcomes. As the high number of permanent standard SIELs issued in 2024 shows, and given the broad range of software covered, equipment and software with "information security" capability should be a compliance focus for companies and a priority area to determine if a licence is needed.

Given the sensitive and rapidly shifting nature of export controls, it is advisable to seek professional legal or compliance advice specific to your organisation's operations and supply chain profile. Please contact any of the attorneys listed below should you have any questions.

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