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EU export control list update

New semiconductor controls and revised industrial thresholds

November 2026

On 19 November 2026, the EU published its annual update to the dual-use control list, extending controls on advanced semiconductors and related equipment while relaxing several thresholds for industrial goods. The revised list takes effect on 20 November 2026.

Commission Delegated Regulation (EU) 2026/2288 (the 2026 Regulation) replaces Annex I to Regulation (EU) 2021/821 (the Dual-Use Regulation). Annex I identifies the goods, software and technology with civilian and military uses for which an export licence is required. Most amendments reflect decisions of the international export-control regimes, whose members agree common lists by consensus. This update also adds a second group of EU-only entries, following commitments accepted by the member states outside those consensus decisions. These additions chiefly concern chips designed for data centres and equipment used to manufacture semiconductors.

International commitments and EU controls

Annex I provides a common list for all member states, organised into 10 categories ranging from nuclear materials to aerospace. National authorities grant export licences, while the European Commission updates the list through delegated acts. The European Parliament and the European Council each have two months to object to an act, with either one able to extend that period by a further two months. Amendments must reflect commitments accepted by the member states under the international regimes or through treaties, such as the Chemical Weapons Convention. The relevant regimes are the Wassenaar Arrangement, covering conventional arms and dual-use goods, the Australia Group for chemical and biological items, the Nuclear Suppliers Group and the Missile Technology Control Regime.[1]

Consensus gives each member of a regime the ability to block a decision. In its January 2024, "White Paper on Export Controls", the European Commission referred to reports that Russia had blocked controls on emerging technologies within the Wassenaar Arrangement, preventing their inclusion in the EU list. It proposed using delegated acts to add items affected by that impasse once the member states had confirmed corresponding international commitments. The member states did so on 23 May 2025, and the 2025 update introduced EU-only entries in a new 500 series, including controls on quantum computers and chips with very high computing performance.[2]

Additional EU controls

On 15 April 2026, the member states informed the European Commission that they had accepted further commitments to control additional items. The resulting changes extend the semiconductor controls introduced in 2025 and add equipment, materials and technology beyond that sector.[3]

The existing controls cover integrated circuits with a Total Processing Performance (TPP) of at least 6,000, a measure of peak computing power. The new entries also cover chips with a TPP of at least 1,600, but below 6,000 where their performance density is at least 5.92. Performance density divides TPP by the combined applicable die area in square millimetres, comprising the area of logic dies manufactured using a process with a non-planar transistor architecture. A note limits this new band to items designed for data centres, broadly defined as facilities that centrally house, interconnect and operate IT and network equipment providing data storage, processing or transmission services, together with the associated power and environmental-control facilities.

1 Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (recast) [2021] OJ L.206/1 (consolidated text of 21 September 2026), arts 3(1), 12(2), 17(1)(a), 18(6), 26(4), Annex I, Annex II, Section A (EU001), Parts 1–2, and Section I.

2 Commission, "White Paper on Export Controls: (COM(2024) 25 final, 24 January 2024) ss 3.1, 5.1; Commission Delegated Regulation (EU) 2025/2003 of 8 September 2025 amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items OJ L, 2025/2003, 14.11.2025, recital (3), Annex, entries 3A501.a.16 and 4A506.

3 Commission Delegated Regulation (EU) 2026/2288 of 14 September 2026 amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items subject to controls on export OJ L, 2026/2288, 19.11.2026, recital (3), arts 1–2, Annex, Part I (definitions), entries 1A004, 1B501, 1B504, 1C350, 1C507, 2B352, 3A001, 3A002, 3A501, 3B001, 3B501, 3D001, 3D002, 4A506, 4A507, 4E001, 5A001, 5E501, 6A002, 6A005, 8A002 and 9E503.

The controls also extend to computers, electronic assemblies and components containing the relevant chips, now including analogue computers. Masks, reticle and imprint templates, which transfer circuit patterns onto chips, are covered where they are designed for these chips, or for the cryogenic chips listed in 2025.

The additions to chipmaking equipment include atomic layer deposition tools for molybdenum or ruthenium that meet specified process conditions, and four types of equipment associated with extreme ultraviolet (EUV) lithography. EUV lithography prints circuit patterns using light at wavelengths between 5 and 124 nanometres. The new controls cover equipment for coating, depositing, baking or developing EUV photoresist; inspecting EUV mask blanks and masks for defects or particles; reshaping or trimming EUV-printed patterns with angled particle or light beams and depositing the multilayer reflectors of EUV masks through ion beam or physical vapour deposition.

Two types of equipment for cleaning individual wafers, distinguished by their drying methods, complete the new hardware controls. The list also covers software specially designed to develop or produce the new equipment, or to use most of it.

Seven further items enter the EU-only controls, five through new entries and two through additions to an existing entry. The five new entries cover equipment that produces multiple parallel silicon carbide fibres by laser-driven chemical vapour deposition; additive manufacturing equipment with ultrasonic extruders or nozzles for explosive, pyrotechnic or propellant devices; and ceramic composites with a glass or oxide matrix reinforced by continuous mullite or alumina-mullite fibres that meet specified strength and creep thresholds at 1,000 °C. They also cover technology for developing gas turbine axial compressors with specified design features and performance, and technical databases, or "libraries", that enable equipment to perform counter-improvised explosive devices (IED) and related functions. Counter-IED equipment uses radio signals to trigger improvised explosive devices prematurely or prevent their detonation.

The two additions to the existing entry concern absolute-position inductive rotary encoders and certain power semiconductors. The encoders are covered where they are no more than 40 mm across, provide a digital output and have a resolution of at least 16 bits. The semiconductor controls concern switches, diodes and modules with a bandgap above 2.0 electronvolts, including silicon carbide and gallium nitride devices, rated for junction temperatures no higher than 215 °C and capable of blocking more than 5,000 volts and carrying more than 1 ampere. An exclusion applies when these devices are incorporated into equipment designed for civil automotive, railway, aircraft, power transmission and distribution, or energy conversion applications.

One amendment narrows the EU-only controls. Quantum computers remain listed, but Category 4's general technology entry no longer covers the technology for their development, production or use. Controls remain on technology for developing or producing qubit devices, quantum control components and quantum measurement devices. The additions described above arise from the member states' further commitments, rather than decisions of the international regimes.

Changes agreed through the international regimes

The amendments arising from the regimes' lists dated between September 2025 and April 2026 relax several established thresholds, with particularly significant changes for industrial lasers.[4] For non-tunable continuous-wave lasers operating between 975 and 1,150 nanometres, the general output-power threshold for single-mode models rises from 1 kW to 2 kW. Models with a spectral bandwidth below 40 GHz remain controlled above 500 W, while a new entry covers those above 1.5 kW with a spectral bandwidth between 40 and 100 GHz. Multimode models are now controlled above 3 kW, compared with the previous threshold of 2 kW, or 1 kW where wall-plug efficiency exceeded 18%. The exemption for industrial multimode lasers with beam quality below specified levels now extends to 40 kW.

Other changes reduce controls on batteries, converters and underwater equipment. Rechargeable battery cells are now controlled only above 500 Wh/kg, up from 350 Wh/kg. Analogue-to-digital converters with 8- or 9-bit resolution are no longer controlled solely because their sampling rate exceeds 1.3 billion samples per second, and the entries for underwater vision and lighting systems have been removed. A new exemption covers optical fibre Bragg gratings designed for temperature sensing between −100 °C and 150 °C. A further note clarifies that chemical detectors limited to a specified set of toxic chemicals, including chlorine and phosgene, fall outside the relevant control.

The regimes have also agreed tighter controls in certain areas. The Australia Group reduced the threshold for automated nucleic acid synthesizers, which build DNA and RNA chains, from continuous chains longer than 1,500 bases to those longer than 500 bases, regardless of error rate. It also added the chemical-weapons precursor 1,1,3,3-tetraethylguanidine. The European Commission describes many of the remaining amendments as editorial. Taken together, the changes may reduce licensing requirements for a range of industrial products while extending them further along the semiconductor supply chain.

4 Commission, "Summary of 2026 Amendments to Annex I to Regulation (EU) 2021/821" (change note summary, 2026) 1–9; Commission, "2026 Update of the EU Control List of Dual-Use Items" (news article, 14 September 2026).

Sanctions and general export authorisations

The revised list also affects the scope of the EU's Russia sanctions. Council Regulation (EU) No 833/2014 (the Russia Regulation) defines dual-use goods and technology by reference to Annex I and prohibits their sale, supply, transfer or export to persons in Russia or for use in Russia, subject to the applicable exceptions and derogations. The additional entries therefore fall within that prohibition from 20 November 2026. Removal from Annex I does not, however, establish that an item may be exported to Russia: the separate controls on goods and technology in Annex VII to the Russia Regulation remain in place.[5]

EU001 continues to provide a general export authorisation for eligible shipments to Australia, Canada, Iceland, Japan, New Zealand, Norway, Switzerland, including Liechtenstein, the UK and the US. Exporters who meet its conditions can generally rely on that standing authorisation without obtaining an individual licence. Although EU001 excludes certain Annex I entries, none of the EU-only entries appears among those exclusions. Its destination, end-use and other conditions still determine whether it is available for a particular export.

The UK is updating its controls on a separate timetable. The Export Control (Amendment) Regulations 2026 (SI 2026/1150), laid before Parliament on 3 November 2026, are due to take effect on 1 December 2026, subject to parliamentary procedure. They incorporate the regimes' 2025 decisions and changes concerning advanced and emerging technologies, including semiconductor manufacturing equipment, advanced computing and specialised materials.[6] Businesses exporting from both the EU and the UK may therefore face different classifications and effective dates; the parallel changes do not establish that the two lists will match after 1 December.

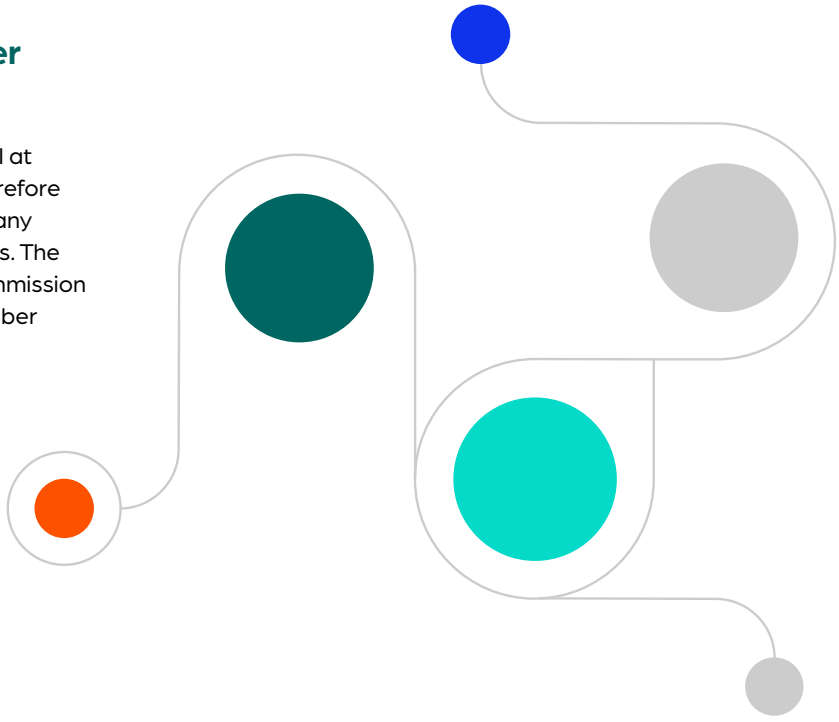
Commercial Implications and Further Developments

The European Commission generally updates Annex I at least once a year. A subsequent delegated act is therefore expected to reflect the regimes' 2026 decisions and any further commitments accepted by the member states. The Dual-Use Regulation also requires the European Commission to evaluate the wider framework between 10 September 2026 and 10 September 2028.

The immediate consequences will differ by product. With no transition period, exports of newly listed chips, servers, manufacturing equipment and other items may require authorisation from 20 November. For products affected by the relaxed thresholds, the amendment may remove an Annex I licensing requirement, although national controls and sanctions can still apply. Classifications recorded in customs and screening systems may consequently cease to reflect the applicable rules. The revised technical entry, the available authorisation and any separate restriction will together determine the position for each export.

How can we help?

Our International Trade & Foreign Investment Practice advises businesses on EU, UK and US export controls and sanctions. We help clients determine how changes to the control lists affect their products and transactions, prepare licence applications and establish whether general export authorisations are available. Because the revised list took effect without a transition period, we can also help businesses review the classifications recorded in their customs and screening systems, identify products that now fall within the new semiconductor and other EU-only entries, as well as confirm where the relaxed thresholds may remove a licensing requirement. For businesses operating in both the EU and the UK, we can map the differences in classification and timing that may arise once the UK amendments take effect. We also review compliance programmes and the interaction between export controls and Russia sanctions, including where different rules apply to the same product or supply chain.



5 Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine [2014] OJ L229/1 (consolidated text of 24 July 2026), arts 1(a), 2(1), 2a(1), Annex VII.

6 Department for Business and Trade, Export Control Joint Unit, "Notice to exporters 2026/24: amendments to UK strategic export controls" (23 October 2026, updated 11 November 2026), sections "Introduction" and "Updates to strategic export control lists".

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