

UK strategic export controls

Proposed changes expected in December 2026

29 October 2026

The UK plans to amend its strategic export controls in early December 2026, leaving exporters with limited time to assess the proposed changes.

The Export Control Joint Unit (ECJU), which administers the UK's export licensing system, announced proposed changes to the UK's strategic export controls on 23 October 2026. Subject to ministerial and parliamentary approval, the amendments will revise the military and dual-use control lists, change the treatment of Haiti and the Central African Republic under export and trade controls, and revoke General Export Authorisation No. 001 (GEA001) in Great Britain (but not Northern Ireland). Exporters registered for GEA001 when the regulations come into force would be able to continue using it until 1 April 2027, giving them time to establish whether its replacement affects their exports.

The existing framework

The Military List is set out in Schedule 2 to The Export Control Order 2008 (2008 Order), while the dual-use list, covering items with both civil and military uses, appears in Annex I to the assimilated Dual-Use Regulation. The latter derives from an EU regulation retained in domestic law after Brexit. Both lists are shaped by changes over time to multilateral export control regimes, in which participating states decide which goods, software and technologies should be controlled.

The proposed regulations would also amend Schedule 4 to the 2008 Order, which identifies destinations subject to stricter export or trade controls, and revoke GEA001 from the assimilated Dual-Use Regulation. The revocation of GEA001 would not apply in Northern Ireland, where EU dual-use rules continue to apply.¹

Changes to the control lists

ECJU intends to update both the military and dual-use lists to reflect the 2025 reviews of the multilateral export control regimes, including the Wassenaar Arrangement, which covers conventional arms and dual-use goods and technologies, and the Australia Group, which works to prevent the proliferation of chemical and biological weapons. The proposals also revise controls on certain advanced and emerging technologies, including semiconductor manufacturing equipment, advanced computing technologies and specialised materials. ECJU presents these changes as part of the UK's wider international commitments to strengthen export controls for national security.

The government expects to lay the regulations before Parliament in November. Their text has not yet been published, but ECJU says that it will appear on legislation.gov.uk, accompanied by an explanatory memorandum.

The European Commission has already published the revised EU dual-use list it adopted on 14 September 2026. It extends controls on advanced computing chips to certain less powerful chips designed for data centres. It also adds equipment used to coat, deposit, bake or develop photoresist, the light-sensitive material used in extreme ultraviolet (EUV) lithography to produce advanced chips. Further additions cover equipment for inspecting EUV masks, which carry the circuit pattern, and certain ceramic composite materials. The revised EU list will apply in Northern Ireland once it enters into force following publication in the EU's Official Journal.²

Since both lists draw on decisions made through the same regimes, the EU text provides a useful starting point for reviewing product classifications. It does not, however, offer a precise template for the scope of the UK amendments, particularly for emerging technologies. Exporters should confirm their export classification assessments against the UK changes when they are published: unless the regulations provide otherwise, newly controlled items will require an export licence from the date they take effect. Businesses exporting from both Great Britain and Northern Ireland will also need to account for any difference in the start dates.

¹ Export Control Joint Unit, "[Notice to exporters 2026/24: proposed amendments to UK strategic export controls](#)" (23 October 2026).

² 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 subject to controls on export](#)" C(2026) 6323 final (14 September 2026), entries 1C507.c, 3A501.a.16, 3B501.o and 3B501.p.

Haiti and the Central African Republic

Schedule 4 distinguishes between embargoed destinations, listed in Parts 1 and 2, and destinations subject to transit controls, listed in Parts 3 and 4. The embargoed destinations include Iran, North Korea, Russia and China. Part 3 requires a licence for military goods passing through the UK to the destinations listed there; Part 4 imposes that requirement on a narrower category of weapons.

The proposals would move Haiti from Part 3 to Part 2, and the Central African Republic from Part 2 to Part 3. UK exporters with business involving either country should, therefore, review the regulations once published, since the change of Part alters the licensing requirements that apply to those destinations.

Replacing GEA001

GEA001 permits exports of most dual-use items to Australia, Canada, Japan, New Zealand, Norway, Switzerland (including Liechtenstein) and the US, with exclusions for specified sensitive items. The Dual-Use Open General Export Licence (OGEL) already covers those destinations and others, allowing registered UK exporters to make eligible shipments without a separate export licence application for each export. ECJU therefore considers GEA001 to have been superseded in Great Britain. Under the proposals, exporters registered for GEA001 when the regulations take effect could continue using it until 1 April 2027. The revocation would not extend to Northern Ireland, where the EU authorisation remains available.

Before switching, UK exporters should check the nuances of the new OGEL. For example, the OGEL cannot be used if the exporter knows that the items' final destination lies outside the permitted destinations, and that no processing or working will take place in a permitted destination before onward export, unless the journey to the final destination would be allowed under another valid licence. UK exporters must register for the OGEL before using it and quote the licence reference on customs declarations. They should complete that process well before 1 April 2027 and apply in good time for any individual licences needed for shipments outside its scope.³

Preparing for the changes

Although the UK text remains outstanding, businesses can begin by reviewing product classifications against the revised EU list, which indicates the likely direction of the UK changes. They should also assess their exposure to Haiti and the Central African Republic, while exporters currently using GEA001 should establish which shipments the OGEL would cover and which would require separate licensing after the transition ends. Each assessment will need to be revisited when the UK regulations are published, taking account of their final scope and provisions.

How can we help?

Our International Trade & Foreign Investment Practice advises on the classification of goods, software and technology, the application of brokering and transit controls, and the effective use of export licences. With ECJU's classification advice service paused since 12 October 2026, we can help businesses assess how the revised lists stand to affect their products, and identify any licensing steps needed before the changes take effect. That work can include checking whether planned shipments qualify for the OGEL, assisting with registration or individual licence applications, and reviewing arrangements involving Haiti or the Central African Republic. We can also help businesses adapt their contracts and internal compliance procedures to account for new licensing requirements.

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³ [Council Regulation \(EC\) No 428/2009 of 5 May 2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items \(Recast\)](#), annexes IIa, IIg and IV; Export Control Joint Unit, "[Open General Export Licence \(Export of Dual-Use items\)](#)" (14 October 2026) paras 4(5), 5(1) and 6, schs 1–2.