

The UK's new consolidated Dual-Use Open General Export Licence:

One licence, expanded permitted destinations and a new customs declaration system condition

Europe – June 2026

On 25 June 2026, the UK's Export Control Joint Unit (ECJU) announced, in Notice to Exporters 2026/14, a new, consolidated Dual-Use Open General Export Licence (OGEL) that merges the existing EU member states Dual-Use OGEL and General Export Authorisation 001 into a single open licence, and extends open licence coverage to new destinations: South Korea, Singapore, Chile, Uruguay and the British Overseas Territories. The ECJU projects that the change will save exporters more than 500 individual licence applications a year.¹

What has changed

The reform is best understood as export facilitation, not a relaxation of controls. The underlying control lists are unchanged, registration on the SPIRE system remains mandatory and the conditions attaching to use of open licences continue to apply. What has changed is the packaging of permissions: two separate instruments (and associated reference numbers) are replaced by one licence, and the trusted destination list is enlarged on the basis of a data-led review of historic licensing decisions that found exports to the new destinations permitted under this OGEL to be consistently approved and presenting low risk.

The additions rest on the UK's own risk assessment rather than that of a multilateral regime, a distinction that matters for diversion risk diligence, discussed below. A parallel measure, introduced in May, will mean that all relevant OGELs will change in the coming months to add a condition requiring the licence reference to be entered on Customs Declaration Service (CDS) for all tangible exports. The inclusion of said licence reference will be an HM Revenue and Customs (HMRC) enforcement matter.

The statutory Framework Is unchanged

UK strategic export controls rest on the Export Control Act 2002 and the Export Control Order 2008 (SI 2008/3231), with dual-use goods, software and technology with both civil and military applications, defined in Article 2(1) of the Order and listed in Annex I to the Assimilated Dual-Use Regulation (EC) No 428/2009 and in Schedule 3 to the Order (the UK Dual-Use List). The new OGEL operates within this framework; it changes how permissions are packaged, not the scope of what is controlled.²

An OGEL is a "ready to use" licence with fixed terms, open to any exporter who registers, offering a low friction route for lower-risk goods to lower-risk destinations. A Standard Individual Export Licence (SIEL) is exporter-, consignee- and item-specific, and is assessed case-by-case. An Open Individual Export Licence (OIEL) is exporter-specific, but covers multiple shipments of specified goods to specified destinations over a period. Registration to use an OGEL binds the exporter to its conditions, means an exporter is subject to ECJU compliance audits and triggers record-keeping requirements. Exporting controlled items without a valid licence, or in breach of OGEL conditions, is a criminal offence carrying up to 10 years' imprisonment, although most cases are resolved by compound settlement with HMRC.

¹ Export Control Joint Unit, Notice to Exporters 2026/14 announcing the new consolidated Dual-Use Open General Export Licence (GOV.UK, c. 25 June 2026). The consolidation, the new permitted destinations and the projected saving of 500+ applications are as stated in the notice.

² Export Control Act 2002; Export Control Order 2008 (SI 2008/3231); Assimilated Regulation (EC) No 428/2009 (Annex I), retained for Great Britain under the European Union (Withdrawal) Act 2018.

The two predecessor licences

The EU member states Dual-Use OGEL, first published in 2019 as a “no deal” contingency and most recently updated on 16 December 2025, permitted the export of Annex I dual-use items from Great Britain to EU member states.³ GEA001, the assimilated successor to the EU’s Union General Export Authorisation EU001, authorised the export of the bulk of Annex I items to Australia, Canada, Japan, New Zealand, Norway, Switzerland (including Liechtenstein) and the US.⁴

Both are now being folded into one OGEL with a single registration and a single Great Britain Open General Export Licence (GBOGE) reference, and the destination list has been expanded. The permitted and excluded items are not loosened by the consolidation; rather, the change is structural. Exporters relying on either predecessor should not assume continuity. They should reread the consolidated conditions and confirm whether their existing arrangements carry across, or whether and update to processes are required.

The new permitted destinations

South Korea has a free trade agreement (FTA) with the UK, and it is a major dual-use and semiconductor trading partner. Singapore, a leading financial and logistics hub covered by a UK FTA and the UK-Singapore Digital Economy Agreement, operates robust national controls under its Strategic Goods (Control) Act, even though it is not itself a member of the multilateral regimes. Chile, Uruguay and the British Overseas Territories are also included.

A regime-membership reality check

The advent of this new OGEL with expanded permitted destinations does not align directly to membership of the four multilateral export-control regimes. The four regimes are the Wassenaar Arrangement, the Nuclear Suppliers Group, the Australia Group and the Missile Technology Control Regime. Of the five new destinations, only South Korea participates in all four. Singapore, Chile and Uruguay are members of none (Chile has been a candidate country for the Wassenaar Arrangement since 2015), and the British Overseas Territories are not members in their own right.⁵

This divergence means end-use, end-user and diversion-risk screening remain important, despite expanded options for export under this new OGEL and the EU will not necessarily treat the same destinations as comparably low-risk under its own authorisations.

The CDS declaration requirement: The operational connection

Notice to Exporters 2026/13 introduces a critical operational consideration. Registered OGEL and General Export Authorisation (GEA) users receive a unique reference in the form GBOGE20XX/XXXXXX. In this notice the Export Control Joint Unit is notifying exporters that all relevant OGELs will be updated in due course with a condition, which will require the licence reference to be entered in the licence field (currently box 44) on the CDS for all tangible exports. This brings open-licence exports into line with SIELs and OIELs.⁶

Once the condition applies to a given licence, inclusion of the reference on CDS becomes an enforcement matter for HMRC and an incorrect declaration could constitute a criminal offence under section 167 of the Customs and Excise Management Act 1979.⁷ Where a freight forwarder declares on the exporter’s behalf, the exporter must supply the correct reference and instruction. The exporter of the goods and any agent concerned in the exportation or shipment may both be considered responsible for the accuracy of a declaration. If a reference is missed, a CDS entry can be amended before clearance, or afterwards via form C1700. The resulting Export Entry Reference must be retained. The ECJU is encouraging exporters to begin quoting their OGEL or GEA licence reference on CDS now, before the updates are made.

Post-Brexit divergence from the EU

The reform widens, rather than narrows, post-Brexit divergence. The EU’s framework is Regulation (EU) 2021/821, whose Union GEA EU001 covers Australia, Canada, Iceland, Japan, New Zealand, Norway, Switzerland (including Liechtenstein), the UK and the US.⁸ The UK’s consolidated OGEL now reaches South Korea, Singapore, Chile, Uruguay and the British Overseas Territories, none of which are on the EU001 list. The UK is therefore building a broader trusted-destination network than the EU.

The two control lists remain broadly aligned at the Annex I/ Wassenaar level, but update on different timetables and through different instruments. The EU’s latest emerging-technology update took effect on 15 November 2025, and the UK’s on 16 December 2025, while Wassenaar itself has been effectively stalled on new dual-use listings since 2022, pushing both sides toward autonomous national updates.⁹ The authorisation architecture and destination coverage are thus diverging even where the substantive controls converge.

³ “Open general export licence (export of dual-use items to EU member states)”, ECJU, dated 16 December 2025 (GOV.UK).

⁴ “Union General Export Authorisations (GEAs)”; GOV.UK, Assimilated General Export Authorisation No. EU001, covering Australia, Canada, Japan, New Zealand, Norway, Switzerland (incl. Liechtenstein) and the USA.

⁵ Membership lists of the Wassenaar Arrangement, Nuclear Suppliers Group, Australia Group and Missile Technology Control Regime; US Bureau of Industry and Security / Department of Commerce country guidance. Only South Korea participates in all four; Singapore, Chile and Uruguay participate in none (Chile a candidate since 2015).

⁶ Notice to Exporters 2026/13: “Declaring exports under OGELs and GEAs on the UK’s Customs Declarations System”, ECJU, (GOV.UK, published 13 May 2026).

⁷ Customs and Excise Management Act 1979, section 167.

⁸ Regulation (EU) 2021/821 (in force 9 September 2021); Union General Export Authorisation EU001 (Annex II), covering Australia, Canada, Iceland, Japan, New Zealand, Norway, Switzerland (incl. Liechtenstein), the United Kingdom and the United States.

⁹ Commission Delegated Regulation (EU) 2025/2003 (EU control-list update, in force 15 November 2025); Export Control (Amendment) (No. 2) Regulations 2025 (UK, in force 16 December 2025).

Northern Ireland and dual-stream operators

Under the Windsor Framework, EU dual-use law (Regulation (EU) 2021/821) continues to apply in Northern Ireland, while the assimilated regulation applies in Great Britain.¹⁰ A UK licence, including this OGEL, authorises export from Great Britain only; it does not cover exports from Northern Ireland or the EU. Movements of Annex I items from Great Britain to Northern Ireland do not require an export licence. From an EU perspective, the requirement for relevant commercial documents relating to intra-union transfers of dual-use items listed in Annex I clearly indicating that those items are subject to controls if exported from the customs territory of the EU remain in place.

How can we help?

As an international firm with a dedicated International Trade & Foreign Investment Practice, we help exporters turn changes such as this new OGEL into an operator-ready compliance plan, advising on item classification against the consolidated control list, OGEL eligibility and registration, the new CDS declaration workflow and freight-forwarder instructions. We support dual-stream UK and EU operators in mapping flows to the correct point of export, calibrating diversion risk diligence and assisting with preparation for ECJU compliance audits, so that more open licensing arrangements do not create avoidable enforcement exposure.

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¹⁰ Windsor Framework / Protocol on Ireland/Northern Ireland: Regulation (EU) 2021/821 continues to apply in Northern Ireland, while the assimilated Regulation applies in Great Britain.