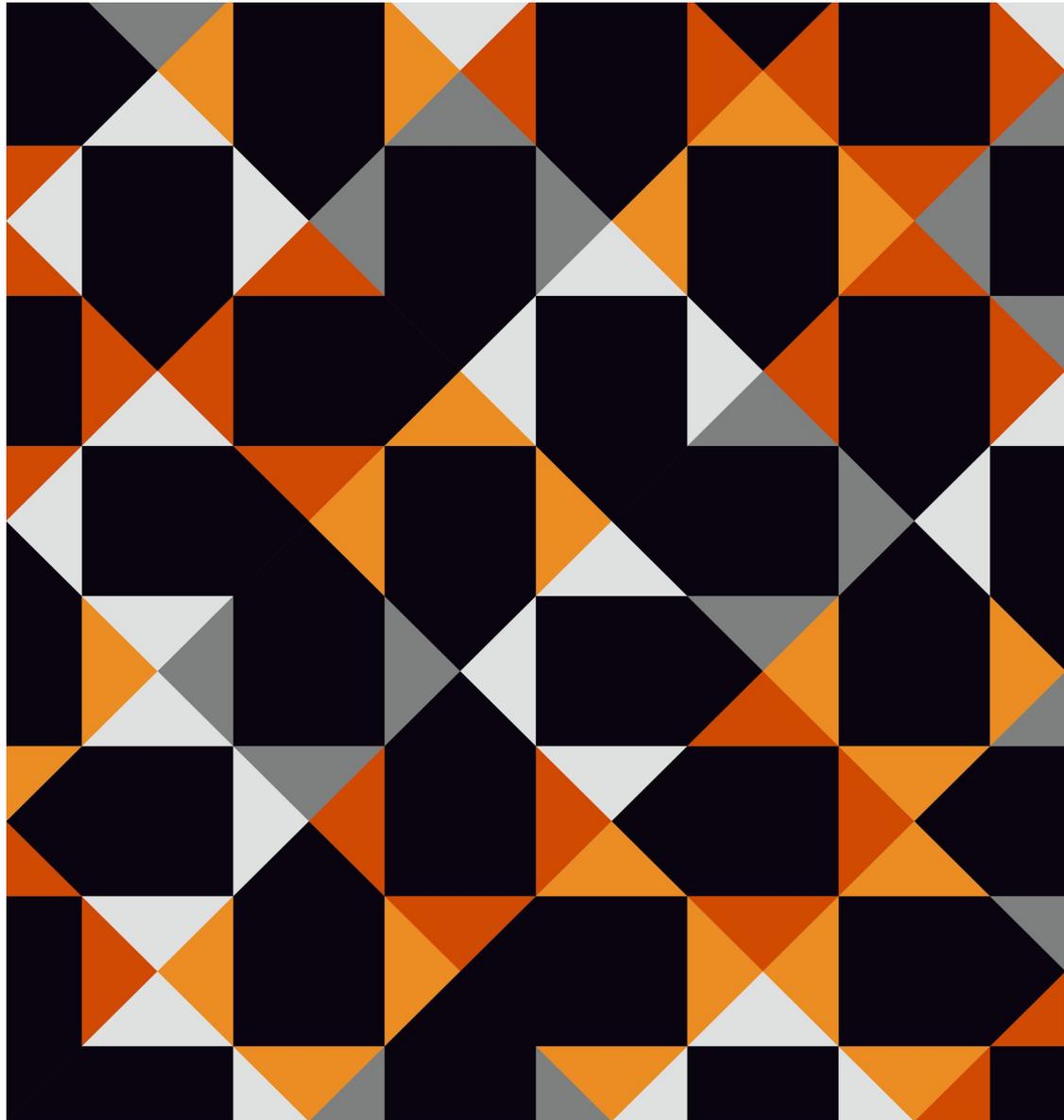


PwC Middle East: Publication of the UAE Control List for Dual-Use Items

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In brief

Circular No. 1 of 2022 regarding the implementation of Targeted Financial Sanctions (TFS) on UNSCRs 1718 (2006) and 2231 (2015)

Recently, the Ministry of Economy of the UAE issued Circular No 1 of 2022, requiring Designated Non-Financial Businesses and Professionals (DNFBP), e.g. real estate brokers and agents, legal firms, accounting firms and corporate services providers, to comply with the sanctions imposed by UN Security Council's resolutions.

Most importantly, the Circular includes a publicised version of the UAE Control List for the import and export of dual-use items. This is the first time this (consolidated) list has been made publicly available so it is important for businesses dealing in such commodities to become familiar with the relevant provisions to avoid potential penalties, business disruption and risk of non-compliance.

In detail

Export Controls on Dual-Use Items

Circular No. 1 of 2022 requires all DNFBPs to comply with the current regulations that control the import and export of dual-use items. These regulations apply to all entities engaged in the import and/or export of dual-use items. In addition to these existing norms, Circular No. 1 of 2022 requires DNFBPs to ensure that customers dealing with dual use items have the permit to conduct those trades pursuant the relevant policies already in force on the matter.

For this matter, a consolidated list of Dual-Use Items, "UAE Control List", related to the control list annexed to Resolution No. 50 of 2020, which amended the list adopted by Federal Law No. 13 of 2007, has been made publicly available by the Executive Office for Control and Non-Proliferation. The list can be accessed [here](#).

This is the first time the (consolidated) UAE Control List has been made publicly available, which is significant for any entities dealing in dual-use goods. The UAE Control List implements a number of internationally agreed dual-use agreements, including the Wassenaar Agreement. There are 11 categories of dual-use goods which are standardised amongst dual-use agreements generally, with category 11 specific for commodities controlled at a national level.

In addition, a database for chemicals has also been created allowing entities to determine whether chemicals are controlled goods or require a declaration. The goods can be searched by HS code, Chemical Abstract Service (CAS) number, ECCN, etc. The database can also be accessed [here](#).

The takeaway

Compliance with the UAE Dual-Use Regulations is of critical importance for any entities engaged in the import and/or export of Dual-Use goods (including technology and software).

The UAE Control List is now publicly available, and enables entities to determine whether their goods are subject to controls and therefore require the appropriate licences/authorisations to import or export.

Businesses should become familiar with these requirements and obtain the relevant permits/licences in order to avoid penalties, license revocation, business disruption or any other consequences that may arise for non-compliance with export control requirements.

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Let's talk

For a deeper discussion of how this issue might affect your business, please contact:

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Thank you

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