

Dutch Export Policy on Strategic Goods in 2024

Report by the Minister for Foreign Trade and the Minister of Foreign Affairs on the issuing of export licences for military, dual-use and torture goods.

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Foreword

Note for Readers

This is the 28th annual report on Dutch export policy on military and dual-use goods, collectively referred to as strategic goods. The report provides background information on the nature of strategic goods, the reasons for applying export controls to these goods and the form that this policy took in 2024.

Global developments are exacerbating the growing threat to the security of the Netherlands, its international partners and ordinary people worldwide. These include the horrific war that has been raging in Ukraine since Russia's full-scale illegal invasion in 2022 and the Middle East conflict that broke out in October 2023, sparking a humanitarian catastrophe in the Gaza Strip that continues to this day. Unfortunately, this trend showed no sign of changing in 2024.

The Dutch strategic goods industry is characterised by high-value technological products, innovation and a highly educated workforce. The sector is strongly export-oriented, and trade is therefore seen as a necessary condition for business continuity, with due regard for the importance of proper export controls to prevent the undesirable use of military and dual-use goods for the purpose of human rights violations or in connection with the proliferation of weapons of mass destruction.

Policy-related matters requiring attention in 2024 included the introduction of national regulations to impose controls on a number of emerging and sensitive technologies,¹ and ongoing efforts to adopt controls at multilateral level, in order to ensure a level playing field for the Dutch strategic goods industry.

This period also saw public and political attention for ongoing military support for Ukraine and a broader debate about how the Netherlands should deal with controls on the export of military and dual-use goods, for example to Israel in relation to the conflict in the Gaza Strip. As these developments confirm, export control policy is very much in flux. This is illustrated by the increased attention being paid to the issue in parliament. Whereas 50 parliamentary papers were labelled as dealing with 'export control' in 2020, this number gradually increased to 175 in the five years between then and to 2024. This is evidence of an ongoing dialogue with parliament on export control, which the government greatly values. Together with the regular online reports,² the annual report is one of the main ways in which the government demonstrates its commitment to maximum transparency on export control policy.

¹ Order of the Minister for Foreign Trade and Development of 11 October 2024, no. BZ2405833, introducing an authorisation requirement for the export of products not listed in Annex I of Regulation 2021/821 (Order on Control Measures Supplemental to the Dual-Use Regulation).

² Reports on dual-use goods and military goods | Export control policy for strategic goods | Rijksoverheid.nl

Hanneke Boerma
Minister for Foreign Trade

Caspar Veldkamp
Minister of Foreign Affairs

Principles of export control

What is export control and why is it necessary?

Export controls are rooted in legislation implemented by the Netherlands to control the export, for reasons of national and international security, of certain strategic goods, technologies and services.³ The controls are designed to prevent the undesirable proliferation of arms and other military goods, limit the spread of sensitive technologies and ensure that Dutch exports do not support any activities that are at odds with the Netherlands' interests and obligations. Violation of export control legislation may result in severe penalties, such as fines or imprisonment.

Why export controls?



Figure 1. Why are export controls necessary?

Export control measures are adopted multilaterally, on the basis of agreements made in multilateral export control regimes (see Chapter 8). Multilateral measures are important because they guarantee a joint approach by multiple countries, making it more difficult to divert controlled goods via countries with different legislation. This contributes to global security. Thanks to a widely shared, equal assessment framework, multilateral regimes help foster a level playing field for companies. This will ensure that companies in one country don't find themselves at a competitive disadvantage compared with those in another.

³ See the Strategic Goods Decree (in Dutch): <https://wetten.overheid.nl/BWBR0024139/2021-09-09/0>, and the Strategic Services Act (in Dutch): <https://wetten.overheid.nl/BWBR0030545/2022-07-07/0>.

Which goods are controlled?

The term 'strategic goods' is a collective name for dual-use goods and military goods. Dual-use goods are goods that can be used for both civil and military purposes and which the relevant export control regime has deemed to be sufficiently sensitive to be controlled. They include advanced computer chips, rocket engines and industrial mixing equipment that can also be used for chemical weapons production. These dual-use goods are listed in Annex I of the European Union's Dual-Use Regulation.⁴

Military goods are defined as all products that are included in the Common Military List (ML) of the European Union.⁵ They range from smaller components and products such as wheels for armoured vehicles or image intensifier equipment for observation purposes to entire systems such as naval ships and radar installations.

Procedures

General

Export licences for strategic goods (military and dual-use goods) are issued on the basis of the General Customs Act (*Algemene Douanewet*) and the associated export control regulations.⁶

Companies or persons wishing to export goods or technology appearing on the Common Military List of the European Union or Annex 1 of the EU Regulation on dual-use items⁷ must apply to the Central Import and Export Office (CDIU) for an export licence. The CDIU, which is part of the Customs Administration, issues export licences under the policy supervision of the Ministry of Foreign Affairs. Licences are issued on behalf of the Minister for Foreign Trade and Development.

⁴ <https://eur-lex.europa.eu/eli/reg/2021/821>

⁵ [https://eur-lex.europa.eu/legal-content/NL/TXT/?uri=CELEX:52023XG0228\(01\)](https://eur-lex.europa.eu/legal-content/NL/TXT/?uri=CELEX:52023XG0228(01))

⁶ The complete legislative framework can be found on the central government website:

<https://www.government.nl/topics/export-controls-of-strategic-goods/laws-and-rules-on-the-export-of-strategic-goods>.

⁷ <https://eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=CELEX:02009R0428-20211007&from=EN>.

Types of licence

Military goods

When military goods are sent to a recipient outside the Netherlands, a distinction is made between a 'transfer' to recipients in other EU countries and 'export' to countries outside the EU. A licence requirement applies in both cases, either for a transfer licence or an export licence.

Different types of licence applications

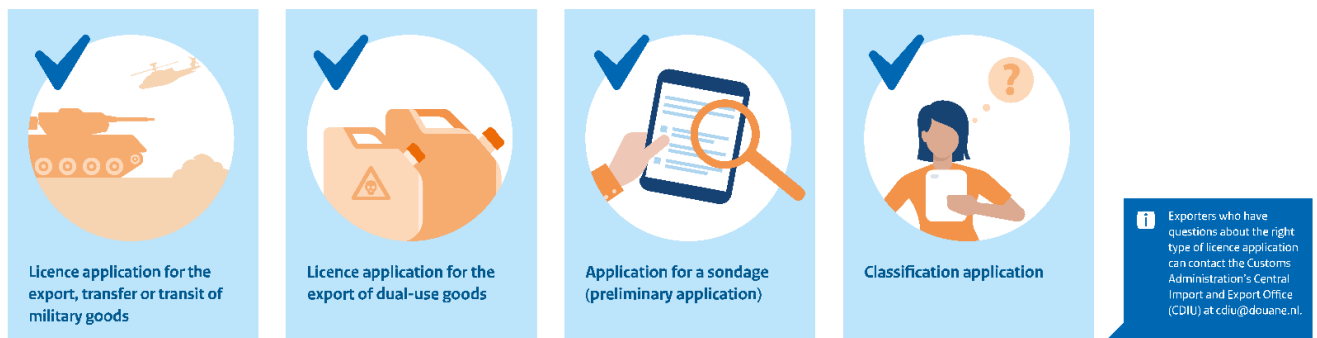


Figure 2. The different types of licence application

These licences fall into different categories depending on the type of export or transfer:

- Individual licences for a single transfer of military goods to a single destination;
- Global licences for the export or transfer of military goods to recipients or categories of recipient in one or more countries of final destination;
- General licences for the unlimited (in terms of both quantity and timeframe) export or transfer of military goods in accordance with the parameters stipulated in the licence in question. Companies can register for a general licence under conditions specified in that licence. Registered companies report on the use of the general licence in line with the rules set out in the licence in question.

Dual-use goods

For dual-use goods, the licence requirement applies only to export outside the EU. No licence requirement applies for transfers of goods within the EU. The only exception is the intra-EU transfer of goods that appear in Annex IV of the Dual-Use Regulation. For these goods, a licence is also required within the EU.

For dual-use goods too, there are individual, global and general licences:

- Individual licences for a single export to a single end user;
- Global licences for the export of dual-use goods to recipients in one or more countries of final destination;
- General licences for the unlimited export (in terms of both quantity and timeframe) of dual-use goods to certain less sensitive destinations. Companies can register for a general licence under conditions specified in the licence.

Sondage

A sondage is a preliminary application which exporters can submit for transactions (for both military and dual-use goods) for which contract negotiations with the end user have not yet been started or completed. This enables a company to explore at an early stage whether an export licence can be obtained for the transaction in question before any major investments are made. No rights can be derived from a positive response to a sondage, but it does help a company anticipate the likelihood of being granted an export licence if circumstances remain unchanged.

Catch-all goods

In the case of goods that are not subject to mandatory licensing (non-controlled goods) – because they do not meet the technical specifications set down in the Dual-Use Regulation – an ad hoc licence requirement ('catch-all order') may still be imposed if there is any indication that exported goods will be used for the development or manufacture of weapons of mass destruction, or deployed for military end use in a country subject to an arms embargo, or are intended for use in connection with internal repression or the commission of serious violations of human rights and international humanitarian law.⁸ This does not constitute a ban on the transaction itself, but rather a licence requirement for export of this specific – previously non-controlled – good to a specific final destination. Under certain conditions, the authorities may still ultimately decide to issue an export licence if, for example, there are safeguards in place that will minimise the risk of undesirable end use.

In principle, no licence requirement applies for the transit of dual-use goods. However, if information is available to indicate that the goods could be used for the development or manufacture of weapons of mass destruction or for military end use in a country subject to an arms embargo, their transit may be subject to an ad hoc licence requirement after all.

Classification application

If there is any doubt as to whether a transaction involving a particular good requires a licence, a classification application can be submitted. On the basis of the technical data provided, specialists from the Customs Administration and the Ministry of Foreign Affairs will determine whether the transaction falls under the Dual-Use Regulation.

Procedures for military goods

Commercial licence applications

In principle, licence applications for the export of military goods to NATO and EU member states and countries with a similar status (referred to as EU/NATO+ countries, namely Australia, Japan, New Zealand and Switzerland) are processed by the CDIU, on the basis of a procedure formulated by the Ministry of Foreign Affairs. The exceptions to this rule are Cyprus and Türkiye. Applications for exports to these two countries – and all other countries – are submitted to the Ministry of Foreign Affairs for decision. In assessing licence

⁸ See Articles 4 and 5 of EU Regulation 821/2021, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2021:206:FULL&from=EN>.

applications against the eight criteria of the EU's Common Position on arms export control,⁹ the Minister for Foreign Trade and Development seeks foreign policy guidance from the Minister of Foreign Affairs. This guidance plays a key role in the final decision on whether or not to issue an export licence.

Licence applications from the Ministry of Defence and the National Police

Both the disposal of surplus equipment by the Ministry of Defence and export by the National Police are governed by the normal licensing procedure. As with private sector export transactions, the Ministry of Foreign Affairs also assesses these transactions against the criteria set out in the arms export policy. Prior to signing a sales contract for surplus Dutch weapon systems, the Minister of Defence will notify the House of Representatives. If this is not possible for commercial reasons, the Minister of Defence will notify the House of Representatives immediately after the contract is signed.¹⁰

Procedures for dual-use goods

Various procedures are in place for dual-use applications, depending on the country of final destination and the type of product. For countries that belong to the export control regime that covers the goods in question, individual and global licence applications are in principle assessed by the CDIU, in line with the applicable work instruction. These countries subscribe to the same principles as the Netherlands with regard to trade in these sensitive goods. For some goods destined for specific countries, a general export licence suffices. In such cases there is no review at transaction level, although there is a registration and archiving requirement. For example, there is a general licence (EU001) requirement for the export of dual-use goods listed in Annex I of the Dual-Use Regulation and destined for Australia, Canada, Japan, New Zealand, Norway and Switzerland, including Liechtenstein, the United Kingdom and the United States. All politically sensitive applications are submitted to the Ministry of Foreign Affairs for a decision.

Procedures under the Anti-Torture Regulation

Goods covered by the Anti-Torture Regulation¹¹ may not be freely imported from, exported to or transshipped to or from third countries. If no prohibition applies, goods and services that fall under the Anti-Torture Regulation require a licence. Licence applications for goods and services listed in the Anti-Torture Regulation for destinations where capital punishment is still imposed or carried out are in all cases submitted to the Ministry of Foreign Affairs by the CDIU. At present, more than two-thirds of the world's countries have abolished the death penalty. Licence applications for destinations where the death penalty has been abolished are dealt with independently by the CDIU.

¹⁰ <https://eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=CELEX:02008E0944-20190917&from=EN>.

¹¹ Regulation (EU) 2019/125 of the European Parliament and of the Council of 16 January 2019 concerning trade in certain goods which could be used for capital punishment, torture or other cruel, inhuman or degrading treatment or punishment.

EU coordination to ensure a level playing field

Denials of licence applications are recorded in an EU database. Under the EU's Common Position on arms export controls and the Dual-Use Regulation, if another member state receives a similar application, they are obliged to hold bilateral consultations, with a view to ensuring that they do not undermine each other's decisions. As EU member states are thus aware of each other's views on similar applications, this helps to ensure a more unified implementation of EU agreements on the control of strategic goods. This benefits the consolidation of a level European playing field for the business community.

Assessment framework

Military goods

EU criteria

Licence applications for the export of military equipment are assessed on a case-by-case basis against the eight criteria of the EU Common Position on arms export controls, with due regard for the nature of the product, the country of final destination, the end user and the intended end use. These eight criteria (see Figure 3) were initially defined by the European Councils of Luxembourg (1991) and Lisbon (1992) and subsequently incorporated in the EU Code of Conduct on Arms Exports (1998). On 8 December 2008 the Council of the European Union decided to transform the EU Code of Conduct from 1998 into Common Position 2008/944/CFSP defining common rules governing control of exports of military technology and equipment.

Besides the assessment against the EU Common Position on arms export controls, member states exchange information on the basis of (1) an obligation to notify all other member states when a member state denies a licence application and (2) an obligation to hold bilateral consultations when a member state is considering an application that is essentially identical to another application that has previously been denied by another member state.

Albania, Bosnia and Herzegovina, Canada, North Macedonia, Georgia, Iceland, Montenegro and Norway have endorsed the criteria and principles of the Common Position. In 2017 Norway joined the European Council Working Party on Conventional Arms Exports (COARM) online denial database, making it a participant in information exchanges between EU member states about denied licence applications and the consultations that are conducted through this system.

Arms embargoes

The Netherlands fully observes all arms embargoes imposed by the UN, the Organization for Security and Co-operation in Europe (OSCE) and the EU. An overview of current UN/EU arms embargoes can be found on the EU Sanctions Map.¹² An overview of the current OSCE embargoes can be found on the OSCE website.¹³

¹² <https://www.sanctionsmap.eu/>

¹³ OSCE Minsk Group | OSCE

Eight criteria of Common Position



Figure 3. The eight criteria of Common Position 2008/944/CFSP

Dual-use goods

Licence applications for dual-use goods are assessed on the basis of the criteria listed in the Dual-Use Regulation.¹⁴ For each application, a risk assessment is made with regard to the likelihood of undesirable end use, on the basis of factors like the nature of the goods in question, the plausibility of the stated end use, the end user and the country of destination. In making this assessment the relevant parties also consider UN and EU decisions related to the destination in question, such as sanctions and embargoes. With the help of an assessment framework, this assessment leads to a decision about whether to grant or deny the licence application. Dual-use goods that have a conventional military end use are, like military goods, assessed on the basis of the Common Position. Denials of dual-use licence applications are recorded in an EU database. Under the Dual-Use Regulation, if another member state receives a similar application, they are obliged to hold bilateral consultations, with a view to ensuring that they do not undermine each other's decisions.

Assessment framework for goods listed in the Anti-Torture Regulation

Besides dual-use goods, the Ministry of Foreign Affairs also assesses licence applications for goods and services covered by Regulation (EU) 2019/125 (Anti-Torture Regulation).

The Anti-Torture Regulation makes a distinction between two categories of goods, namely those for which trade is prohibited (Annex II) and those for which a licence is required (Annex III and Annex IV). It is prohibited to trade in goods which have no practical use other than for the purpose of capital punishment or for the purpose of torture or other cruel, inhuman or degrading treatment or punishment (Annex II), such as guillotines or thumb screws. An exception may be made if it can be demonstrated that the goods will be used for a museum exhibition in the country of final destination.

Annex III of the Anti-Torture Regulation lists goods that could be used for purposes such as riot control or self-protection. Examples include certain portable electric discharge weapons and fixed or mountable devices for the dispersion of incapacitating or irritating chemical substances such as pepper spray. A licence will not be issued if there are reasonable grounds to assume that a law enforcement agency or a natural or legal person in a third country could use the goods for torture or other cruel, inhuman or degrading treatment or punishment, including judicial corporal punishment.

Annex IV of the Anti-Torture Regulation lists goods that have medical applications, but which could also be used for the purpose of capital punishment. These include anaesthetic agents such as pentobarbital and thiopental. No licence will be issued if there are reasonable grounds to assume that the goods listed in Annex IV could be used for the purpose of capital punishment in a third country.

¹⁴ <https://eur-lex.europa.eu/eli/reg/2021/821>

Transparency

The Netherlands is an international leader when it comes to transparency about the export and transit of strategic goods. Transparency benefits dialogue about this sensitive topic and thus helps to prevent the irresponsible build-up of weapons arsenals and limit the undesirable spread of other strategic goods.

Reporting

Since the 1990s a growing number of countries have published national annual reports on arms exports.¹⁵ The Netherlands ranks among the most transparent of these countries. For example, the latest edition of the Small Arms Trade Transparency Barometer ranks the Netherlands in fourth place, after Switzerland, the United Kingdom and Romania.¹⁶ In addition, for a number of years the Netherlands has supported the Arms Trade Treaty (ATT) Monitor, which surveys how many countries fulfil their reporting obligations with regard to arms exports.¹⁷ At UN level, the Netherlands also seeks to draw attention to transparency and openness in this area (see also section 8.2).

In addition to this annual report, the Netherlands regularly publishes key information regarding all licences issued for the export of military and dual-use goods, as well as key information about the transit of military goods through Dutch territory. The government has posted links on its internet portal to all the various national and international reports drawn up by the Netherlands, such as the EU annual reports on arms exports and reports in connection with the ATT and the UN Register of Conventional Arms.¹⁸

The Ministerial Order on Advanced Semiconductor Manufacturing Equipment entered into force in September 2023. The Ministerial Order on Control Measures Supplemental to the Dual-Use Regulation took effect on 1 December 2024. Neither order entails a reporting requirement as laid down in EU Regulation 2021/821.

Parliament

The government and parliament exchange views on export control policy in various ways. Based on the annual report, the minister and the Foreign Trade and Development Committee hold a debate on export control each year. The debate on the 2023 annual report took place on 26 November 2024.

Written questions about export control are also submitted on a regular basis, and the government informs parliament in writing of any relevant policy developments and amendments.

Lastly, the House of Representatives has since 2012 been informed under the accelerated parliamentary notification procedure of new licences for the definitive export of complete

¹⁵ <https://www.sipri.org/databases/national-reports>

¹⁶ <https://smallarmssurvey.org/sites/default/files/SAS-Transparency-Barometer-2022.pdf>

¹⁷ <https://attmonitor.org/en/>

¹⁸ <https://www.rijksoverheid.nl/onderwerpen/exportcontrole-strategische-goederen/rapportages-dual-use-en-militaire-goederen>

military and other systems worth over €2 million to countries other than Australia, Japan, New Zealand, Switzerland or a member state of the EU or NATO. This takes place within two weeks of the decision, and notifications are accompanied by an explanatory note.¹⁹ In the 2024 reporting year, three transactions required accelerated parliamentary notification. The House of Representatives was informed about deliveries to Ukraine in separate letters.²⁰ The following overview shows communications by the government to the House of Representatives in respect of the export of strategic goods in 2024.

¹⁹ The accelerated reporting procedure is based on the letter to the House of Representatives of 10 June 2011 announcing a stricter arms export policy (Parliamentary Paper, 2010-2011, 22 054, no. 165) and the motion submitted by MP Joël Voordewind et al. on 22 December 2011 on lowering to €2 million the threshold triggering the accelerated parliamentary notification procedure for certain arms export licence applications (Parliamentary Paper, 2011-2012, 22 054, no. 181).

²⁰ Parliamentary Papers 22 054 and 36 045 no. 432 (6 October 2024); Parliamentary Papers 22 054 and 36 045, no. 421 (1 July 2024); Parliamentary Papers 22 054 and 36 045, no. 420 (13 June 2024).

Table 1. Overview of parliamentary papers relating to export control of strategic goods

Parliamentary paper number	Date	Type of parliamentary paper	Title
2024D01769	22 January 2024	Convocation of a committee activity	Revised convocation of a committee debate on arms export policy, 29 February 2024
2024D03391	31 January 2024	Letter from the government	Written responses to questions asked during the first part of the debate on the Foreign Trade and Development Cooperation budget on 30 January 2024
2024D03622	1 February 2024	Letter from the parliamentary committee to the minister	To the Minister for Foreign Trade and Development Cooperation in response to a letter from Stop Arms Trade
2024D04036	5 February 2024	Response to written questions	Response to questions raised by MP Femke Zeedijk about the article 'Intrekken exportvergunning nieuwe tegenslag ASML' (Revocation of export licence a new blow to ASML)
2024D05567	14 February 2024	Letter from the government	Written responses to questions asked during the first part of the debate on the Foreign Affairs budget on 13 February 2024
2024D07094	28 February 2024	Letter from the government	Response to the committee's request regarding the letter from civil society organisations about the Netherlands' planned accession to the agreement on defence export control
2024D07324	29 February 2024	Response to written questions	Response to question from MP Sarah Dobbe about the transshipment of parts for the F-35 or other weapon systems to Israel
2024D07703	1 March 2024	Letter from the government	Government assessment of the White Paper on Export Controls

			– new Commission proposals and initiatives by the EU member states
2024D09494	12 March 2024	Other	Non-paper for improved EU coordination on export controls
2024D16833	24 April 2024	Letter from the government	The government's follow-up to the judgment by The Hague Court of Appeal about the transshipment of F-35 parts to Israel
2024D19460	16 May 2024	Response to written questions	Response to question by MPs Laurens Dassen, Kati Piri and Stephan van Baarle about the article 'Kabinet zoekt na verbod naar andere wegen voor leveren F-35-onderdelen aan Israël' (Following ban, government looks for other ways to deliver F-35 parts to Israel)
2024D19468	16 May 2024	Response to written questions	Response to questions by MP Sarah Dobbe about the delivery of F-35 parts to Israel
2024D21780	29 May 2024	Letter from the government	Response to motions submitted during the brief plenary debate on arms export policy of 13 March 2024
2024D24012	10 June 2024	Letter from the government	Policy response by the Ministry of Foreign Affairs to the periodic report on budget article 2, 'Security and Stability'
2024D24780	13 June 2024	Letter from the government	Delivery of military goods to Ukraine – arms export policy
2024D28052	1 July 2024	Letter from the government	Additional information on the delivery of military goods to Ukraine
2024D30500	23 August 2024	Response to written questions	Response to questions asked by MPs Derk Boswijk, Hanneke van der Werf and Jan Paternotte about reports that products from manufacturers based in

			the Netherlands were still being found in Russian weapons
2024D30658	27 August 2024	Response to written questions	Response to questions asked by MP Sarah Dobbe about reports that there would be a new lawsuit concerning the export ban on F-35 parts bound for Israel
2024D30813	27 August 2024	Bill	Amendment of the Strategic Services Act and the Economic Offences Act entailing several improvements and the correction of a number of technical omissions for more effective implementation and enforcement of the export control rules
2024D33290	16 September 2024	Letter from the government	Export of military equipment to Singapore
2024D36893	4 October 2024	Response to written questions	Response to questions by MP Christine Teunissen about Dutch deliveries of attack dogs to the Israeli army.
2024D36884	4 October 2024	Response to written questions	Response to questions asked by MPs Roelien Kamminga and Claire Martens-America about the news story 'Nederland wil export ASML naar China verder beperken' (The Netherlands wants to further limit ASML exports to China)
2024D36884	4 October 2024	Response to written questions	Response to questions asked by MPs Roelien Kamminga and Claire Martens-America about the news story 'Nederland wil export ASML naar China verder beperken' (The Netherlands wants to further limit ASML exports to China)

2024D36886	4 October 2024	Response to written questions	Response to questions asked by MP Laurens Dassen about two articles on ASML
2024D36884	4 October 2024	Response to written questions	Response to questions asked by MPs Roelien Kamminga and Claire Martens-America about the news story 'Nederland wil export ASML naar China verder beperken' (The Netherlands wants to further limit ASML exports to China)
2024D36886	4 October 2024	Response to written questions	Response to questions asked by MP Laurens Dassen about two articles on ASML
2024D36888	4 October 2024	Response to written questions	Response to questions asked by MPs Daniëlle Hirsch and Joris Thijssen about Chinese threats to bar ASML from the Chinese market
2024D36919	7 October 2024	Letter from the government	Delivery of military goods to Ukraine
2024D39383	18 October 2024	Letter from the government	National export control measures for high-value and sensitive technologies
2024D41979	5 November 2024	Letter from the government	Report 'Dutch Export Control Policy in 2023'
2024D43869	13 November 2024	Letter from the government	Export of military equipment to Malaysia
2024D44906	19 November 2024	Letter from the government	Written responses to questions asked during the first part of the debate on the Foreign Trade and Development budget on 14 November 2024
2024D45202	20 November 2024	Letter from the government	Written responses to questions asked during the first part of the debate on the Foreign Affairs budget on 19 November 2024

2024D36590	21 November 2024	Legislation	Amendment of the Strategic Services Act and the Economic Offences Act entailing several improvements and the correction of a number of technical omissions for more effective implementation and enforcement of the export control rules
2024D45703	22 November 2024	Response to written questions	Response to questions asked by MPs Kati Piri, Daniëlle Hirsch and Jimme Nordkamp about the enforcement of the international legal order with respect to Israel
2024D45718	22 November 2024	Letter from the government	Later submission of substantive questions regarding the debate on the Foreign Trade and Development budget and amendments to the annual export control report
2024D45998	25 November 2024	Letter from the government	Implementation of the motion by MP Dennis Ram on scope for issuing arms export licences for the whole duration of the contract
2024D48704	9 December 2024	Letter from the government	Sale of one Manticore aircraft to Iveco Defence Vehicles SpA
Letter to parliament 2024D50897	18 December 2024	Letter to parliament on pledge to issue arms export permits	Minister for Foreign Trade and Development Reinette Klever informed the House of Representatives about the licences reported on by the news site Follow the Money on 26 November 2024, asserting that the House should have been notified about them by letter.
2024D50901	18 December 2024	Response to written questions	Response to questions asked by MP Sarah Dobbe about the advisory opinion of the Advocate General to the

			Supreme Court about the export of F-35 parts to Israel
2024D50899	18 December 2024	Response to written questions	Response to question asked by MP Laurens Dassen about the article 'Congres VS eist inzage in ASML-export naar China' (US Congress demands to review ASML exports to China)

In addition to the present report on Dutch exports of military and dual-use goods in 2024, information on Dutch export policy is also available from other sources. For instance, the Ministry of Foreign Affairs publishes information about various aspects of export control online at <https://www.government.nl/topics/export-controls-of-strategic-goods>, including a monthly overview of dual-use exports,²¹ cloud-based exports, cryptography, sanctions against Russia and doing business with Iran. Regular seminars on export control policy are also organised for businesses and knowledge institutions.

²¹ <https://www.rijksoverheid.nl/onderwerpen/exportcontrole-strategische-goederen/rapportages-dual-use-en-militaire-goederen>

The Netherlands' export of military goods in 2024

Licences issued

Licences issued for arms export in 2024

In 2024, licences with a total value of €1.87 billion were issued for arms exports

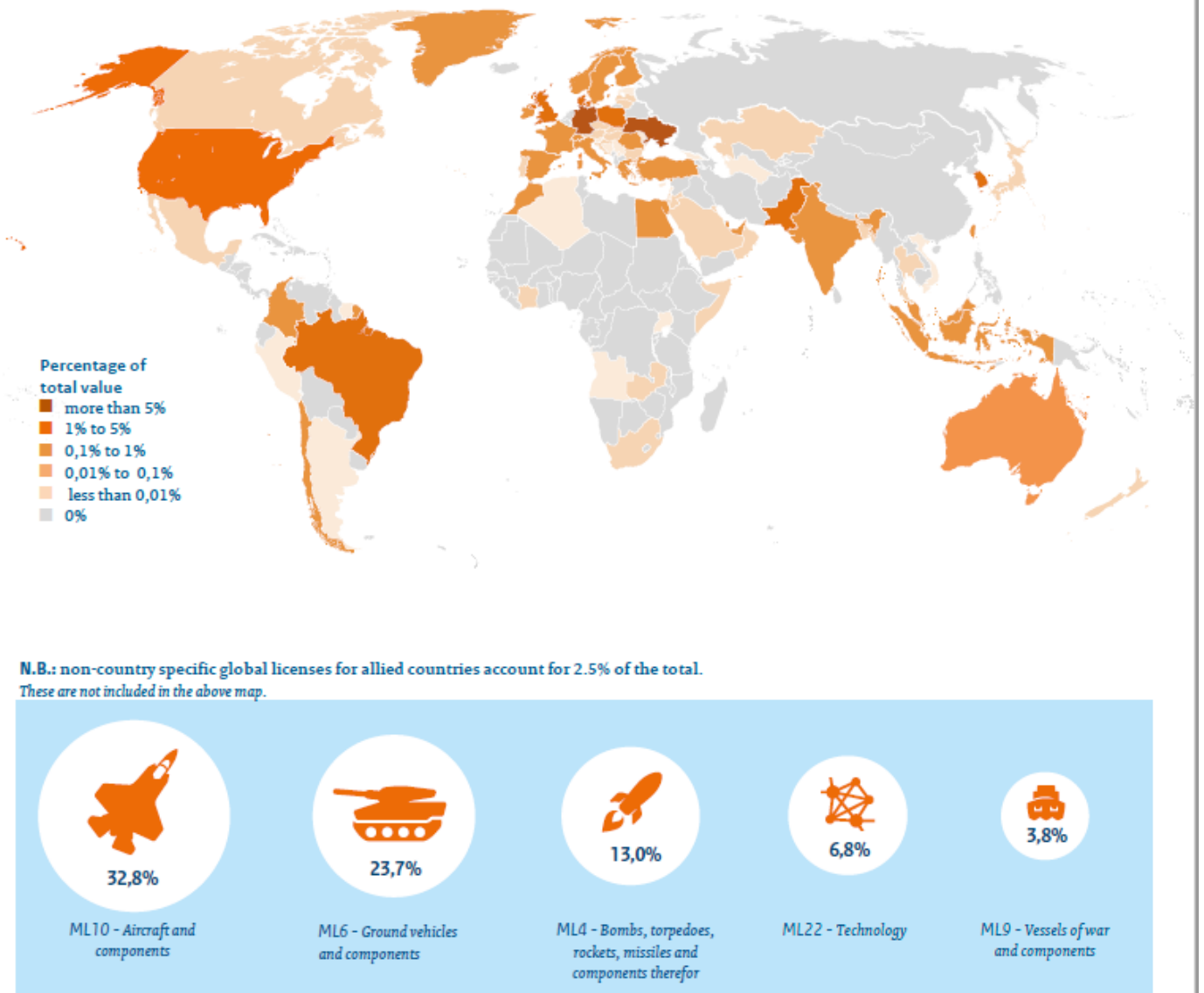


Figure 4. Overview of licences issued, broken down by final destination and top 5 ML categories.²²

Applications for 1,500 licences were submitted in 2024. This represents a decline of 184 compared to 2023 (1,684). Of these, 1,491 were approved. A total of 979 of these 1,491 applications concerned exports whose final destinations were NATO and EU member states and countries with a similar status (referred to as EU/NATO+ countries, namely Australia, Japan, New Zealand and Switzerland). Rounded to two decimal places, the total value of licences issued in 2024 amounted to €1.87 billion. That is an increase compared to previous years (2023: €1.78 billion; 2022: €928.46 million; 2020: €701.76 million; 2019: €923 million). A significant share of this increase relates to Dutch deliveries of military equipment to Ukraine, which also rose considerably in value (€1.09 billion) in comparison to 2023 (€813 million) and which represent over 58% of the total value of licences issued.

The following table provides a regional breakdown of the value of licences issued in 2024. The regions used in this table are the same as in the EU's annual reports on arms export control.²³

²² The description of the various ML categories has been shortened. The complete version can be found in Annexe 1.

²³ Twenty-Fourth Annual Report according to Article 8(2) of Council Common Position 2008/944/CFSP defining common rules governing the control of exports of military technology and equipment, [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52023XG0216\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52023XG0216(01)).

Table 2. Value of licences issued by region

Region	Value of licences issued (in € millions) 2024	Share of total in 2024 (%)
North Africa	9.09	<1%
Sub-Saharan Africa	0.78	<1%
North America	92.18	3.43%
Central America and the Caribbean	1.50	<1%
South America	43.68	2.34%
Central Asia	0.51	<1%
Northeast Asia	30.06	1.6%
Southeast Asia	58.42	3.13%
South Asia	44.26	2.37%
European Union/NAVO+	352.06	18.85%
Other European countries	1,146.97	61.40%
Middle East	22.03	1.18%
Oceania	16.83	<1%
Global	49.22	2.64%
Total	1867.95	100%

Among the top five countries of final destination in terms of total export licence value, Ukraine ranks first (€1.09 billion) because of the large-scale Dutch export of materiel in support of Ukraine's defence against Russia's illegal war of aggression.

In second place is Germany (€171.02 million), primarily because of licences for the export of military vehicles and associated parts (ML6).

In third place is 'various' (€77.66 million). This refers to licences with multiple final destinations.

Fourth place is held by the United States (€62.89 million).

In 2024 there were also three new licences issued for the final export of systems bound for a non-EU/NATO(+) country of final destination and a value of over €2 million. These were licences for the export of radar and C3 systems²⁴ to Egypt, radar and fire-control systems to Singapore and communication systems to Malaysia. The House of Representatives was notified about these deliveries under the accelerated procedure, in accordance with existing agreements.

When comparing this data with international figures, it is important to note that both the Dutch private sector and Dutch government bodies are subject to mandatory licensing for the export of military goods. Only equipment belonging to Dutch military units that is sent abroad for exercises or international operations is exempt from mandatory export licensing. Unlike in some other countries, the sale of surplus defence equipment to third countries is thus included in the figures for the Netherlands.

Supply of military goods to Ukraine

In 2024 the Netherlands continued to provide support to Ukraine, partly in the form of military goods. These deliveries are grounded in Ukraine's right to self-defence under Article 51 of the UN Charter and fall within the frameworks of both the Arms Trade Treaty and the European Common Position on arms export controls (2008/944/CFSP).

As is the case for any other military goods, the export of military goods to Ukraine requires a licence. All exports are carefully assessed against the EU Common Position on arms export controls. Given Ukraine's substantial need for support and the need for rapid delivery of the necessary equipment, an accelerated procedure is used.

Throughout 2024 the House of Representatives received updates on three occasions by means of letters to parliament with confidential annexes providing details of all Dutch military support. Since 13 April 2023 (Parliamentary Paper 2023D15753) the government has been providing greater transparency in respect of exports to Ukraine. Since then, periodic parliamentary letters about supplies to Ukraine have included a public overview of the equipment concerned.

Monthly public reports on the export of military goods, published on www.rijksoverheid.nl, also indicate when licences have been issued, without going into detail about the nature of the goods.

²⁴ C3: command, control and communications.

Licence application denials

In 2024 a total of nine licence applications and preliminary applications (sondages)²⁵ for the export or transshipment of military goods were denied. See Annexe 6 for a complete list of licence application denials.

The number of denials in 2024 (9) was higher than in 2023 (5). For reference, the graph below illustrates the percentage of licence application denials versus the total number of applications in the period from 2005 to 2024.²⁶

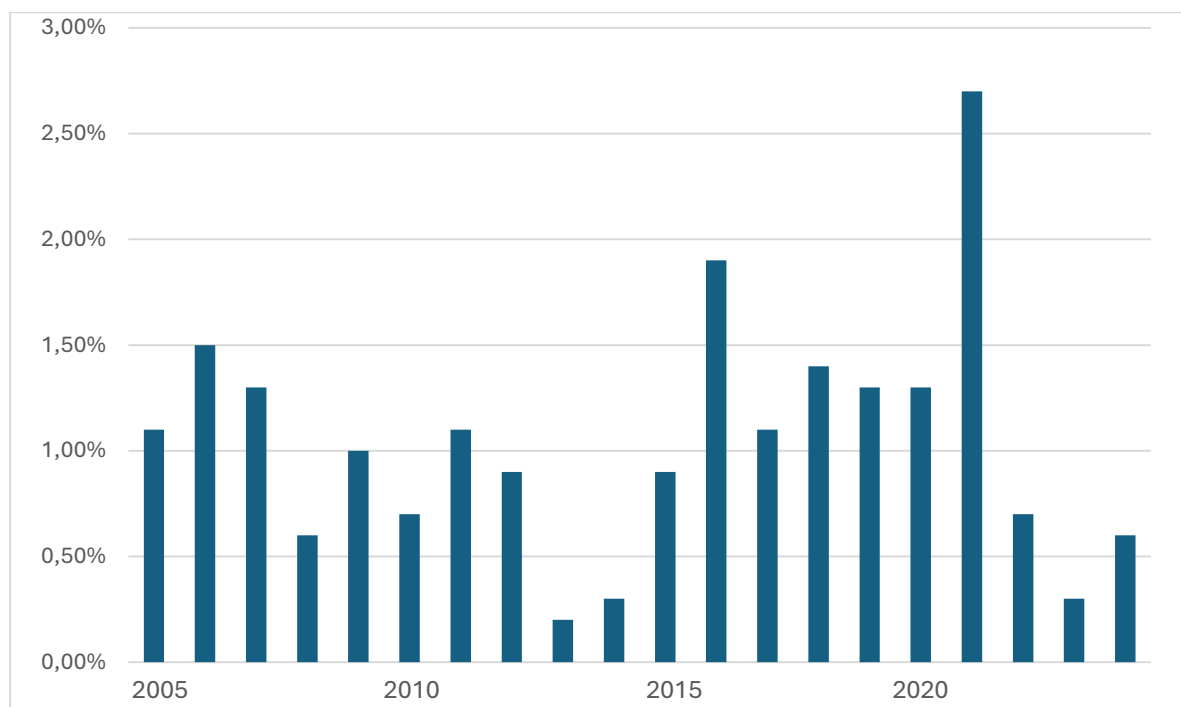


Figure 5. Licence application denials for military goods, 2005 – 2024

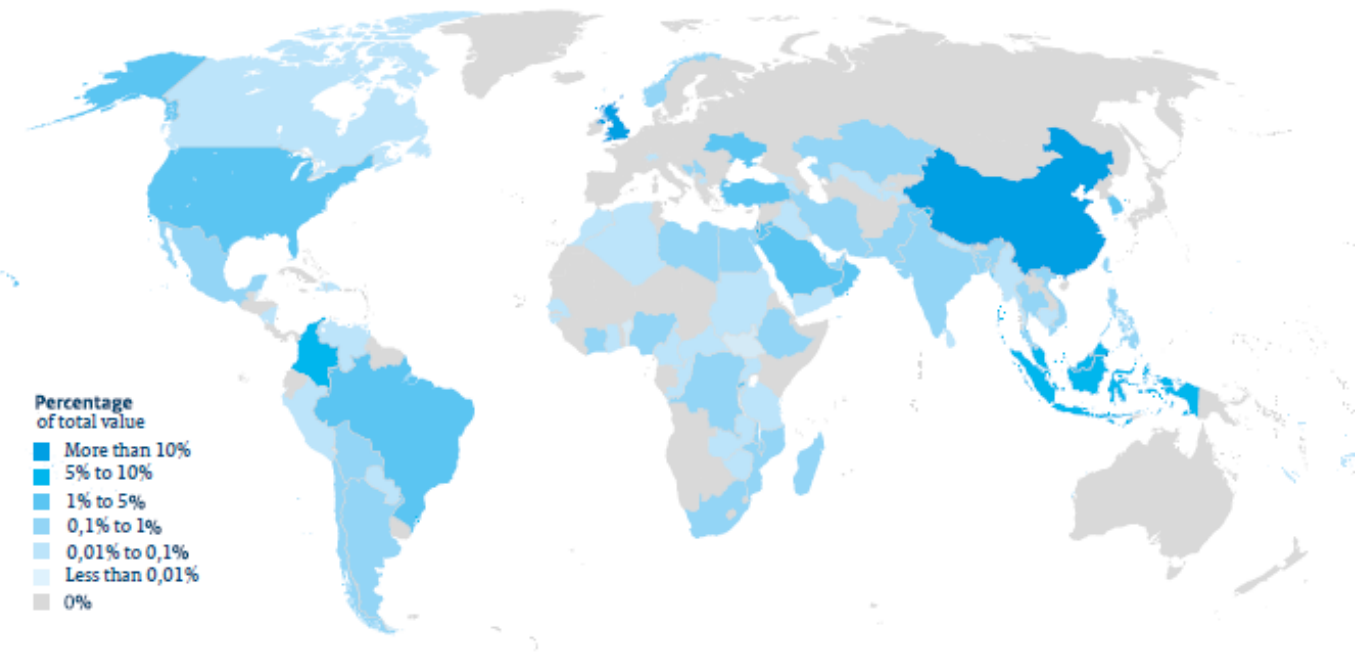
²⁵ A sondage provides a company with an early indication as to whether the desired transaction will be eligible for an export licence. The procedure is the same as the one for a regular export licence. When it comes to the actual transaction (i.e. for delivery), a regular licence will still have to be applied for. A positive response to a sondage does not guarantee a positive outcome to an actual licence application.

²⁶ The number of application denials is expressed as a percentage of the total number of licence applications. This includes licences requested for EU/NATO+ countries as a final destination. These applications are handled independently by the CDIU (see section 2.3). Applications listing EU/NATO+ countries as a final destination account for around 66% of the total number of applications and represent over 80% of the total value of licences issued.

The Netherlands' exports of dual-use goods in 2024

Licences issued for dual-use goods in 2024

In 2024, licences with a total value of €34 billion were issued for dual-use export



N.B.: This graphic depicts the value of dual-use exports of all individually granted licences in 2024. The dual-use export under individual licences amounts to €352 million (1.03%) of the total value of dual-use exports.

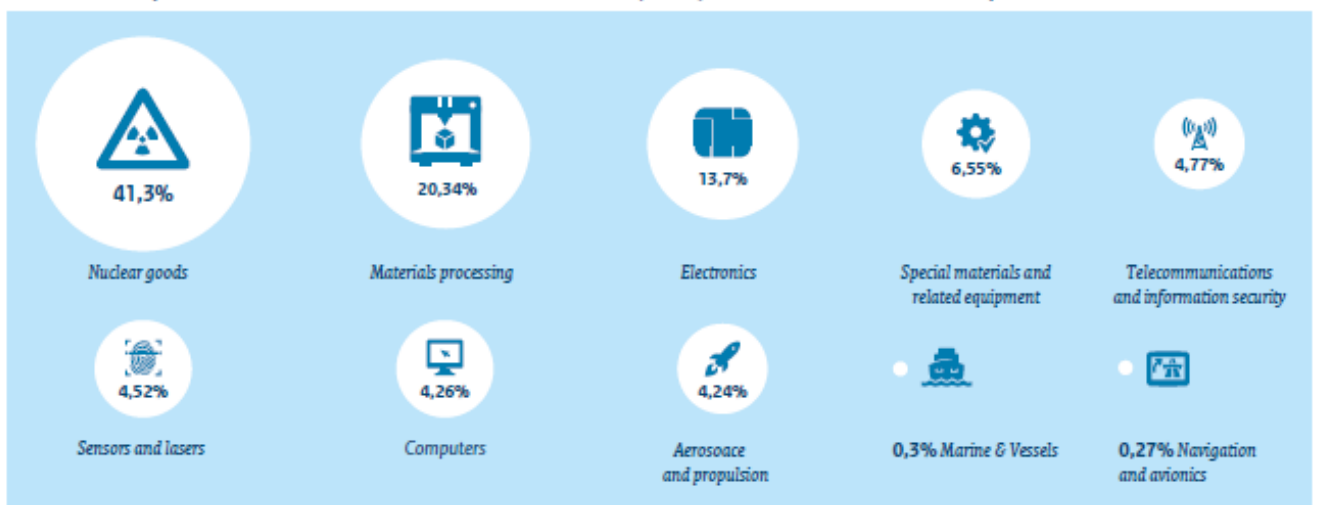


Figure 6. Overview of individual licences issued, broken down by final destination and category of good

Compared to 2023, in 2024 there was a slight drop in the number of dual-use licences issued by the Netherlands under the Dual-Use Regulation. A total of 898 licences were issued in 2023, versus 855 in 2024. The corresponding value of the licences issued rose slightly, from nearly €21 billion in 2023 to almost €34 billion in 2024. The Dual-Use Regulation distinguishes between various categories of goods. The largest share of the total value of the individual licences issued in the Netherlands in 2024 consisted of licences for transactions of goods in the categories of electronics, materials processing and the nuclear industry.

Figure 6 contains a map of the world showing the destinations for which licences were issued. However, because a proportion of dual-use licences are global licences for which it is not possible to divide up the value on the basis of final destination, this map shows only the individual licences issued. The individual licenses shown account for only 1.03% of the total value of the licences issued.

When viewing the map, the reader should bear in mind that the listed values of goods do not lend themselves to straightforward comparisons. For example, one licence for highly sophisticated technical equipment may be of a similar value to a large number of licences for other less expensive goods.

There are five types of export licence for dual-use goods, namely (1) individual licences for a single export of controlled goods to a destination outside the EU; (2) individual licences for a single export of controlled goods to a destination within the EU (intra-EU); (3) global licences; (4) general national licences and (5) Union General Export Authorizations (UGEAs).

Global licences are those for multiple transactions for destinations outside the EU for which the exporters themselves assess the transaction against the 'undesirable end use' criterion, under a government-approved Internal Compliance Programme (ICP). Given that such a licence can cover many transactions for many destinations, the corresponding value for this type of licence is higher than that of individual licences. In addition to the licences listed in table 3, there are also general licences at national and Union level which can be used for relative low-risk transactions on the basis of a one-off registration.

At 13, the number of licence application denials was slightly lower in 2024 than the total for the previous year (14). The value of licence application denials also decreased slightly from €16.72 million to €14.03 million.

Table 3. Number and value of licences issued and denied for dual-use goods in 2024

	Number of licences issued	Value (in € millions)	Number of licences denied	Value (in € millions)
Individual	611	352	12	9
Global	186	32,776	1	95
Within the EU	53	1,144	0	0
Catch-all	5	7	0	0

Total	855	34,280	13	14
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The list of the top 10 destinations of completed exports also factors in the data for both global and general licences. For this reason, the list differs from the global map in figure 7, which only includes individual licences issued.

The list in table 4 is similar to the top 10 for 2023. Taiwan and the United States have swapped positions, but otherwise the destinations in the top 6 are the same. In 2024 Japan and South Africa entered the top 10, while Israel and India dropped out of it.

Table 4. Value of exports of dual-use goods in millions of euros in 2024 (including general licences) for the top 10 countries of final destination

	Destination	Value (in € millions)
1	South Korea	4,510
2	United States of America	4,338
3	Taiwan	2,304
4	United Kingdom	1,089
5	Switzerland	345
6	China	250
7	Türkiye	157
8	Japan	151
9	South Africa	137
10	Norway	137

New sensitive technologies

Technologies such as quantum, AI, integrated photonics, semiconductors and biotechnology are key issues of national and international security. This is partly due to the increasing role of technology in international geopolitical conflicts, the dual-use nature of technology (with the distinction between civil and military use increasingly blurred), and the mutually amplifying interconnectedness of technology and society. This raises the question of what technology we need to regulate and protect with a view to potential national security risks. Answering this question requires consideration of not only security issues, but also market forces and the preservation of an open economy, although national security interests may be a reason for intervention in those areas too. Internationally, the relevant parties are already informally exploring what steps are needed with regard to oversight of exports of new sensitive technologies with dual-use characteristics which are not yet subject to controls. In addition, the Netherlands participates actively in bilateral and multilateral discussions on this issue, both within the EU and NATO and in other international consultative bodies.

Ministerial Order on Advanced Semiconductor Manufacturing Equipment

For reasons of national security, the Netherlands introduced export controls for advanced semiconductor manufacturing equipment in September 2023. Since then, the export of advanced semiconductor manufacturing equipment covered by this legislation has been subject to an authorisation requirement.

Because of the specific ways they can be used, these highly specific technologies for the development and manufacturing of advanced semiconductors constitute a potentially crucial contribution to certain advanced military applications. Non-controlled export of these goods and technologies from the Netherlands could therefore pose a risk to national security.

New insights and technological developments prompted the Netherlands to issue an Ministerial Order amending and expanding the Ministerial Order on Advanced Semiconductor Manufacturing Equipment. This supplemental Ministerial Order entered into force on 7 September 2024. The ultimate decision to apply additional export control measures was taken with due care and surgical precision in order to prevent unnecessary disruption to the relevant value chains and to take due account of the international level playing field.^{27,28}

Ministerial Order on Control Measures Supplemental to the Dual-Use Regulation

For reasons of national security, the Netherlands introduced the Ministerial Order on Control Measures Supplemental to the Dual-Use Regulation on 1 December 2024.²⁹ The products to which this order applies are goods and technologies from the semiconductor, quantum and additive manufacturing industries.

²⁷<https://www.government.nl/documents/parliamentary-documents/2023/03/10/letter-to-parliament-on-additional-export-control-measures-concerning-advanced-semiconductor-manufacturing-equipment>.

²⁸ wetten.nl – Ministerial Order on Advanced Semiconductor Manufacturing Equipment – BWBR0048439

²⁹ <https://wetten.overheid.nl/BWBR0050313/2024-12-01/0>

Because of the specific ways they can be used, the goods and technology subject to export control under this Ministerial Order could constitute a potentially crucial contribution to certain advanced military applications and therefore have a significant impact on national and international security policy. The uncontrolled export of the goods and technologies listed in the appendix to this Ministerial Order has implications for public security interests, including international peace and stability. Besides these security concerns, the introduction of national export controls on these goods and technologies is considered necessary owing to the international nature of the flow of goods and the value chain, and the Netherlands' position therein.

In order to minimise the administrative burden on companies, the Netherlands has introduced a new national general export licence: NL900.³⁰ This will minimise the administrative burden associated with export to certain destinations.

In addition to the Netherlands, several other countries have introduced similar controls on the same security grounds.

Knowledge security

Knowledge security remains an issue that demands increasing international attention. In 2024, as in previous years, further steps were taken to ensure knowledge security and to limit the possibility of undesirable knowledge transfer. For example, the government has sought to raise awareness and foster self-regulation among knowledge institutions by means of a knowledge security dialogue in which central government and knowledge institutions discuss possible courses of action. The government-wide Contact Point for Knowledge Security continues to support knowledge institutions in their commitment to knowledge security,³¹ and it also engages in broad outreach to the knowledge field by hosting 'roadshows'. Following the success of the first export control seminar for knowledge institutions, a second edition was held in 2024. In addition to its national efforts, central government is also taking broader steps by making active contributions in this area in relevant international forums. One way it is doing so is by sharing best practices.

³⁰ <https://wetten.overheid.nl/BWBR0050309/2024-12-01/0>

³¹ <https://english.loketkennisveiligheid.nl/>

Anti-Torture Regulation

Under the Anti-Torture Regulation, the trade in goods and services listed in Annexes III and IV is subject to a licence requirement.³² Table 5 below provides an overview of the licences issued for these goods in 2024.

Table 5. Value of licences issued for the export of goods listed in the Anti-Torture Regulation (by category)

Total 2024				
	Number of licences	Value (in euros)	Final destination	End use
Annex III goods	7	11,217	Aruba, BES islands (Bonaire, St Eustatius, Saba), Curaçao and St Maarten	Law enforcement
Annex IV goods	17	1,663,736	Aruba, BES islands (Bonaire, St Eustatius, Saba), Canada, Curaçao, Lebanon, Occupied Palestinian Territories (Gaza), Djibouti, Hong Kong, Liberia, Malaysia, St Maarten, Morocco, Somalia, United Kingdom	Veterinary, medical and pharmaceutical

See also section 0.

Relevant developments in the European Union

European Council Working Party on Conventional Arms Exports (COARM)

EU cooperation on export controls for conventional weapons takes place mainly in the European Council Working Party on Conventional Arms Exports (COARM). Representatives from the Ministry of Foreign Affairs participate in COARM meetings on behalf of the Netherlands. In COARM, member states share information on their arms export policies in the framework of the EU's Common Security and Defence Policy (CSDP), with a view to improving coordination of those policies and the relevant procedures. In doing so, they promote policy harmonisation and strive to ensure a level playing field. The above-mentioned activities are based on the EU's Common Position on arms export controls, which was adopted by the Council of the European Union on 8 December 2008.

Amending the Common Position

Between 2021 and 2024 the member states were in negotiations over the most recent amendment, which was completed in early 2025. The review was based on the principle that arms export controls would remain a national responsibility and continue to form part of the EU's Common Foreign and Security Policy (CFSP).

By playing an active and constructive role in the review process, the Netherlands helped to achieve an improved framework for a more clear-cut application of European arms export policy and improved streamlining of export controls in the context of European defence industry collaboration, with a view to enhancing European security. This should also prevent a 'waterbed effect', whereby an export that is denied in one member state still takes place because a licence is issued in another. The European defence industry can thus be upscaled to increase European self-sufficiency.

More specifically, the government's efforts during the revision process achieved the following in the amended Common Position:

- The inclusion of voluntary mechanisms for streamlined export control in the case of jointly manufactured military goods;
- Language more firmly embedding countries' right to self-defence;
- The inclusion, as part of assessment criterion 2, of the possible impact of arms exports on gender-specific violence or serious acts of violence against women and children. This is in line with the Arms Trade Treaty, to which the Netherlands is party;
- The inclusion of additional mechanisms to enhance transparency on arms exports and information-sharing between the member states on sensitive final destinations, so as to promote a shared understanding of the assessment criteria.

EU outreach on military goods

COARM also regularly discusses various EU outreach activities that contribute to knowledge development and policymaking, legislation and institutions in respect of export control in partner countries. For example, the EU supports the Arms Trade Treaty (ATT) outreach programme, which seeks to raise awareness of the ATT in partner countries. In February 2025, this programme was extended until February 2028 (Council Decision (CFSP) 2025/442). The EU has a similar outreach programme for the Common Position, which endeavours to raise awareness of the EU Common Position in European Neighbourhood Policy countries. In January 2025, this programme was extended until January 2028 (Council Decision (CFSP) 2025/208).

EU annual report for 2023 on the export of military goods

On 16 December 2024, the Council adopted the EU's 26th Annual Report On Arms Exports,³³ which provides an overview of the subjects discussed in COARM. The report also contains detailed statistical data on exports of military equipment by EU member states in 2023.³⁴

In 2023, the total value of arms export licences issued by EU member states was over €298 billion (versus €176 billion in 2022). At more than €236 billion, France reported the highest value of licences issued. It should be noted, however, that a change to the French licensing system in 2014 means that licences for *potential* orders are now also included in the total. Consequently, this figure is most likely an overestimate, and the true contract value (i.e. the actual figure for which licences were issued) will be lower.

The Netherlands was in 9th place in the EU in 2023. The following table lists the total value of licences issued in 2023 by country and each country's share of the total.

Table 6. European arms exports in 2023

Country	Value of licences issued	Share of total (%)
France ³⁵	235,737,222,899	78.89
Spain	15,703,266,158	5.25
Germany	12,131,073,645	4.06
Poland	10,787,803,804	3.61
Italy	4,766,662,241	1.60
Bulgaria	3,855,183,976	1.29
Belgium	2,137,367,427	0.72
Austria	1,864,932,423	0.62
The Netherlands	1,776,222,900	0.59
Sweden	1,449,798,913	0.49
Slovakia	1,319,546,768	0.44
Czech Republic	1,157,423,465	0.39
Hungary	974,936,218	0.33

³³ 26th Annual Report on Arms Exports (for 2023) launched: EU is a transparent and responsible trader in arms | EEAS.

³⁴ Unlike the present report, the EU annual report does not cover 2024 but 2023, because member states reported on the preceding year over the course of 2024.

³⁵ As noted above, the figures for France are not comparable due to its different reporting system.

Denmark	914,396,532	0.31
Croatia	745,193,127	0.25
Finland	667,237,599	0.22
Estonia	589,588,149	0.20
Greece	586,009,718	0.20
Romania	485,961,182	0.16
Portugal	377,440,865	0.13
Ireland	278,794,634	0.10
Slovenia	99,190,097	0.03
Lithuania	97,930,437	0.03
Latvia	94,663,794	0.03
Cyprus	7,540,635	0.00
Malta	7,501,372	0.00
Luxembourg	6,552,397	0.00
Total	298,619,441,375	100.0%

Besides EU member states and NATO allies, the main destinations for the EU were Saudi Arabia, India, the United Arab Emirates and Ukraine. The breakdown by final destination is illustrated in the figure below:



Figure 7. Value of EU export licences on the basis of final destination in 2023³⁶

The EU's annual report further indicates that member states issued a total of 33,700 licences and that 79 licence applications were denied and reported.³⁷ The number of denied applications was lower than in previous years (2022: 123; 2021: 216; 2020: 203; 2019: 216).

The number of consultations between EU member states regarding denied licence applications totalled 35 in 2022. That is approximately the same as the previous year (36). In 2023, the Netherlands was involved in five consultations (14% of cases), two of which were initiated by the Netherlands itself and three of which by other member states. By means of these consultations the Netherlands is helping to develop a clearer understanding of European arms export control frameworks.

³⁶ Source: COARM Public online database: <https://webgate.ec.europa.eu/eeasqap/sense/app/75fd8e6e-68ac-42dd-a078-f616633118bb/sheet/24ca368f-a36e-4cdb-94c6-00596b50c5ba/state/analysis>.

³⁷ Not all member states report their denials in the EU annual report. The overview of denials is therefore not comprehensive, but it does provide a general idea.

Council Working Party on Dual-Use Goods

EU cooperation on export control of dual-use goods takes place mainly in the Dual-Use Working Party (DUWP). Representatives from the Ministry of Foreign Affairs take part in DUWP meetings on behalf of the Netherlands. As part of the European Economic Security Strategy, the European Commission published a white paper in January 2024 on export controls, putting forward four concrete proposals to enhance EU coordination of export controls.³⁸ Among other issues, the white paper addresses the Commission's concerns about the situation in multilateral export control regimes (a lack of consensus) and the formation of a patchwork of different national export control measures in the single market. In 2023 various EU member states, including the Netherlands, announced and introduced national export control measures on the basis of articles 9 and 10 of the Dual-Use Regulation. This trend continued in 2024 with more national measures in other EU member states. In a non-paper that was circulated among EU member states and shared with the House of Representatives in March 2024,³⁹ the Netherlands made a variety of suggestions aimed at improving European coordination of national export control measures. In mid-2024 the DUWP adopted Council Conclusions on the proposals in the white paper. In addition, the EU member states reached agreement on further exploring the scope for instituting unilateral EU controls, for example via article 17 (Delegated Act) of the Dual-Use Regulation. Finally, there was an undiminished focus on sanctions against Russia, which require specific expertise and capacity in the EU member states and at the Commission.

The Dual-Use Coordination Group (DUCG), established under Article 24 of the Dual-Use Regulation, is tasked with examining issues arising from the application of the Regulation. With a representative from each EU member state, the DUCG is chaired by the European Commission. The DUCG held eight (mainly hybrid) meetings in 2024. It plays a key role in the practical implementation of the Regulation and focuses on the fulfilment of new requirements and mandates in the context of the Regulation, which was revised in 2021. These mainly relate to the exchange of technical and other information and the discussion of implementation issues, such as the distinction between 'national measures' and 'national control lists' within the meaning of article 9 of the Regulation, licences for major projects and controls on intangible technology transfers (ITT).

The control list in Annex I of the Regulation is updated every year to reflect changes in the multilateral export control regimes. The updated and consolidated control list came into effect on 5 December 2024. On 20 October 2023 the Commission published the first overview of the national control lists that apply in the various member states. These include the national controls introduced by Spain and the Netherlands. This overview was amended on 23 September 2024 to include the national controls established by France. This compilation encompasses controls on products at national level on which no consensus has been reached within the multilateral export control regimes. This is the first compilation of national control lists under the Dual-Use Regulation. It enables member states to impose a licence requirement by referring to the national control lists of other member states

³⁸ eur-lex.europa.eu/legal-content/NL/TXT/PDF/?uri=CELEX:52024DC0025

³⁹ <https://www.rijksoverheid.nl/documenten/publicaties/2024/03/12/non-paper-exportcontrole-suggesties-improved-eu-coordination-on-export-controls>

published in the compilation, without necessarily having to establish their own national controls.

The expanded sanctions on Russia have now been in effect for three-and-a-half years. The export-limiting measures they entail still require considerable capacity. This can be attributed, on the one hand, to the sheer number and complexity of the measures and, on the other, to the ever-evolving tactics used by Russia's military industrial complex to circumvent the sanctions. The situation with regard to the sanctions on Iran is no different. Ensuring compliance requires a great deal of work on the part of companies (which often, not surprisingly, have practical questions) and the technical expertise of the Dutch Customs Administration and the Ministry of Foreign Affairs. Obstructing the supply routes of sanctioned countries remains as important as ever, especially in light of the current threats to international security.

Other relevant international developments

Various developments outside the EU are also relevant to arms export policy.

Arms Trade Treaty

A crucial element of the Arms Trade Treaty (ATT) is that it obliges states parties to set up national export control systems, thereby nudging the world in the direction of a more responsible international arms trade system. The treaty's assessment criteria are consistent with several of the criteria that already apply under the EU's Common Position on arms export controls: compliance with international embargoes, no cooperation with violations of international humanitarian law or human rights, and mitigation of the risk of diversion of conventional arms to the illicit market or for unauthorised use.

In 2024 the ATT had 116 states parties. Twenty-six additional countries have signed the treaty but not yet ratified it. The Netherlands and the EU will continue to encourage more countries to accede to the ATT.

The 10th Conference of States Parties (CSP10) of the ATT took place in Geneva from 19 to 23 August 2024. After more than 10 years, there is a widely shared desire among the states parties to shift the ATT's focus to the way in which the treaty is applied in practice by various countries. For instance, there is not enough discussion about the different ways in which states parties conduct risk assessments (in accordance with Article 7 of the ATT) during the licence-issuing process. There is also room for improvement in the form of a more intensive exchange of views between countries regarding the practical challenges of establishing and maintaining an effective national export control system.

For the Netherlands, transparency and compliance by states parties with ATT reporting obligations on arms trade are priority themes within the treaty. For instance, as in previous years, the Netherlands has again made a financial contribution to Control Arms, for the ATT monitor.⁴⁰ In addition the Netherlands is supporting a transparency project by the Stimson Center (an NGO), which will run until August 2025. Both the monitor and the Stimson Center project keep a check on the implementation of the treaty by states parties, particularly with regard to transparency and reporting. The Stimson Center identifies the main challenges facing states parties in meeting their reporting obligations, defines best practices and makes specific recommendations for states parties to improve their reporting systems. These reports are actively introduced by the Stimson Center, and by Control Arms for the ATT monitor, at the plenary discussions of the ATT, and are used by countries as a source of information. As the ATT has no treaty-mandated implementing organisation, these organisations play a vital role in monitoring the treaty's implementation in practice. In addition, Dutch financial support enables the Stimson Center to undertake activities to provide direct assistance to non-reporting states parties in meeting their reporting obligations.

Lastly, the Netherlands' annual ATT report is a public document.⁴¹ As was also the case in 2023, a number of transactions relating to exports to Ukraine cannot be fully reported in this year's ATT report for reasons of national security. This concerns the export of highly strategic

⁴⁰ <http://controlarms.org/en/att-monitor-report/>

⁴¹ <https://thearmstradetreaty.org/download/b2dbb78e-bbe8-3fc6-a985-f0b3f37108c7>

equipment from its own defence stockpile, where full transparency would provide insight into the Netherlands' capabilities in this area. The Netherlands will disclose this information retrospectively when doing so is possible from a security perspective.

Wassenaar Arrangement

The export of strategic goods (military and dual-use) is discussed in the framework of the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies (WA). In the year under review, 42 countries, including the United States, Russia and all EU member states with the exception of Cyprus, participated in this forum, which takes its name from the town where the negotiations to establish the Arrangement were conducted in 1995, under the chairmanship of the Netherlands. It is estimated that these 42 countries jointly account for over 90% of global military exports.

The aim of the WA, as stated in the 'Initial Elements',⁴² is to contribute to regional and international security and stability. This is achieved through regular information sharing on the export to third countries of arms and goods that can be used for military ends. This exchange of information can enable the participating states to assess more accurately whether the build-up of military resources is having a destabilising effect in certain countries or regions. If so, they should exercise greater caution when considering licence applications for these destinations.

The Wassenaar Arrangement maintains both a list of dual-use goods that applies to the Netherlands on the basis of the EU Dual-Use Regulation and a list of military goods that are deemed to be subject to export controls. Any revision of the WA list results in the amendment of the EU Common Military List and the control list of the EU Dual-Use Regulation.

Current events

Geopolitical tensions have severely hampered the process of reaching consensus on export control and political proposals. The full-scale illegal Russian invasion of Ukraine in 2022 further aggravated the impasse within the WA. As a result, it is currently unlikely that it will be possible to control the export of new technologies through the WA in the short term.

Other export control regimes

The Netherlands plays an active role in the various international export control regimes. In respect of non-proliferation, these are the Nuclear Suppliers Group (NSG) for goods and technology that can be used for the production of nuclear weapons, the Australia Group (AG) for biological/chemical weapons, and the Missile Technology Control Regime (MTCR) for the means of delivery (ballistic missiles and unmanned aerial vehicles) of weapons of mass destruction. Countries which participate in these regimes make agreements on export control policy and exchange information on programmes for weapons of mass destruction and their

⁴² The Initial Elements can be consulted on the website of the Wassenaar Arrangement: www.wassenaar.org.

means of delivery in states of concern. The countries also share their experiences and information with regard to enforcement. The countries participating in the respective regimes have also drawn up control lists for a range of goods, production technologies, materials, software and other technology for which an export licence is mandatory. These lists are regularly updated to keep pace with technological developments. Discussions take place in the various regimes about the possible accession new members and about unilateral compliance with guidance and goods lists by non-partner countries.

Due to political tensions, as outlined above under current events in relation to the Wassenaar Arrangement (8.2), it is proving extremely difficult for a number of export control regimes to reach consensus or make progress on technical proposals. This also applies to the MTCR. The AG is, however, making progress in terms of export controls to tackle biological and chemical weapons, because this particular export control regime is composed of a more like-minded group of countries. The NSG is also making progress.

Annexes

Annexe 1: Licences issued for the export of military goods

Overview of the value of licences issued in 2024 for the permanent export of military goods by category of goods and by country of final destination.

Methodology

The values reported below are based on the value of the licences issued during the period under review for the permanent export of military goods. The licence value represents the maximum export value, although this may not necessarily correspond to the value of the exports actually completed at the time of publication. Licences for temporary export have been disregarded in these figures, on the grounds that they are subject to a requirement to reimport. These usually concern shipments for demonstration or exhibition purposes. On the other hand, licences for trial or sample shipments are included in the figures because they are not subject to this requirement due to the nature of the exported goods. Licences for goods that are returned abroad following repair in the Netherlands are similarly not included in the reported figures. In such cases, however, the goods must have been part of a prior shipment from the Netherlands, whose value will therefore have been reflected in a previous report. Without these precautions, the inclusion of such 'return following repair' licences would lead to duplication. Licences whose validity has been extended do not appear in the figures for the same reason. This also applies to licences that are replaced for reasons such as a recipient's change of address. However, if the value of the extension or replacement licence is higher than that of the original licence, the surplus will obviously be reported.

Table 7. Value of licences issued in 2024 for the permanent export of military goods, per ML category⁴³

ML category	Description	Value (in € millions)
ML1	Smooth-bore weapons with a calibre of less than 20 mm, other arms and automatic weapons with a calibre of 12.7 mm (calibre 0.50 inches) or less and accessories and specially designed components therefor	19.41
ML2	Smooth-bore weapons with a calibre of 20 mm or more, other weapons or armament with a calibre greater than 12.7 mm (calibre 0.50 inches), projectors specially designed or modified for military use and accessories and specially designed components therefor	29.75
ML3	Ammunition and fuze setting devices and specially designed components therefor	41.96
ML4	Bombs, torpedoes, rockets, missiles, other explosive devices and charges and related equipment and accessories and specially designed components therefor	242.67
ML5	Fire control, surveillance and warning equipment, and related systems, test and alignment and countermeasure equipment, specially designed for military use, and specially designed components and accessories therefor	71.63
ML6	Ground vehicles and components	443.46
ML7	Chemical agents, 'biological agents', 'riot control agents', radioactive materials, related equipment, components and materials	7.07

⁴³ For further information, see the EU Common Military List.

ML category	Description	Value (in € millions)
ML8	'Energetic materials' and related substances	5.69
ML9	Vessels of war (surface or underwater), special naval equipment, accessories, components and other surface vessels	71.75
ML10	'Aircraft', 'lighter-than-air vehicles', 'unmanned aerial vehicles' ('UAVs'), aero-engines and 'aircraft' equipment, related equipment, and components, specially designed or modified for military use	611.99
ML11	Electronic equipment, 'spacecraft' and components, not specified elsewhere on the EU Common Military List	37.26
ML13	Armoured or protective equipment, constructions and components	0.76
ML14	'Specialised equipment for military training' or for simulating military scenarios, simulators specially designed for training in the use of any firearm or weapon specified by ML1 or ML2, and specially designed components and accessories therefor	13.56
ML15	Imaging or countermeasure equipment specially designed for military use, and specially designed components and accessories therefor	41.12
ML16	Forgings, castings and other unfinished products, specially designed for items specified by ML1 to ML4, ML6, ML9, ML10, ML12 or ML19	33.67
ML17	Miscellaneous equipment, materials and 'libraries' and specially designed components therefor	8.33

ML category	Description	Value (in € millions)
ML18	'Production' equipment, environmental test facilities and components	1.56
ML21	Software	58.87
ML22	Technology	127.43
Total		1867.95

Table 8. Value of licences issued for the permanent export of military goods by country of destination, per ML category

Total for 2024 (€ millions)	ML1	ML2	ML3	ML4	ML5	ML6	ML7	ML8	ML9	ML10	ML11
AUSTRALIA		0.63		1.74	0.91	4.32	0.06		0.02	0.00	
AUSTRIA	0.07		0.24		0.89	0.52				0.00	
BELGIUM					0.00						
BES ISLANDS	0.03		0.07								
BRAZIL					5.80				8.62	0.00	5.83
BRUNEI DARUSSALAM					0.01						
BULGARIA	0.00					0.38					
CANADA	0.00				0.00	0.08			0.00	0.01	0.15
CHILE									2.71	0.76	
CHINA											
COLOMBIA					1.00						1.00
CROATIA	0.00		0.20								
CYPRUS											0.02
CZECH REPUBLIC	0.31		0.48								
DENMARK	0.01			0.01		22.16			0.01		
EGYPT					0.00						0.22
ESTONIA	0.01					0.13					
EU/NATO+		11.08	0.09		9.98	0.04			0.86	0.88	2.83
EUROPEAN UNION											1.68
FINLAND	0.00		0.00		0.26	0.38	0.40		6.20		
FRANCE	0.02	1.88	0.00		0.11	0.10			1.95	6.67	
GERMANY	0.68	5.12	0.17	60.18	0.10	88.40	0.05	0.00	2.08	0.16	1.49

GREECE	0.00		0.50						2.00		
HUNGARY	0.00				0.04	0.37					0.15
INDIA					2.61	0.13			0.78	0.05	0.12
INDONESIA					0.78		2.29		0.41		1.25
IRELAND	0.01				2.25	2.25			0.04		
ISRAEL					0.05					0.33	
ITALY	0.00			0.02						2.00	
JAPAN				0.01	0.13				0.04		
JORDAN						1.05					
KAZAKHSTAN					0.03	0.48					
KOSOVO			0.01	0.01							
KUWAIT					0.33						0.34
LATVIA	0.00					0.39					
LITHUANIA	0.02										
MALAYSIA					1.67				1.55		1.33
MALTA	0.02	0.02									
MEXICO					0.35						0.35
MOLDOVA	0.00		0.02	0.01							
MOROCCO		1.82			1.82				1.82		1.82
NORWAY	0.00	2.98	0.08	11.54		0.50			0.41		
OMAN										0.50	
PAKISTAN					11.89					1.50	1.43
POLAND	0.29	0.04	0.30	3.61		25.71			1.77	0.09	
PORTUGAL	0.05								0.01	0.46	
QATAR					0.41					3.50	0.33
ROMANIA	0.01			0.30						5.02	
SAUDI ARABIA						0.01			0.57		

SERBIA					0.01						
SINGAPORE	0.03				10.66	0.03					0.03
SLOVAKIA	0.00					0.26					
SLOVENIA	0.00										
SOMALIA	0.08		0.08								
SOUTH AFRICA	0.07									0.48	
SOUTH KOREA					4.14	0.28	0.71		0.26	0.44	0.15
SPAIN	0.02			1.34	0.43	0.42			0.06	0.93	0.56
SURINAME	0.00										
SWEDEN	0.12		0.17			1.68			0.07		
TAIWAN									10.25		
THAILAND					0.00						
TIMOR-LESTE										0.00	
TÜRKIYE	0.15		0.00		0.59				1.17		0.04
UKRAINE	15.40	6.11	38.71	163.63	2.79	284.69	3.56	5.68	20.05	501.47	14.85
UNITED ARAB EMIRATES				0.14	0.65						0.19
UNITED KINGDOM	0.08	0.02	0.03	0.01	10.06	5.85			3.40	2.57	0.59
UNITED STATES	1.80	0.05	0.80	0.09	0.13	0.91		0.00	4.67	44.15	0.15
VARIOUS										40.00	
VIETNAM											
Total	19.41	29.75	41.96	242.67	71.63	443.46	7.07	5.69	71.75	611.99	37.26

Total 2024 (in € millions)	ML13	ML14	ML15	ML16	ML17	ML18	ML21	ML22	Total
AUSTRALIA		0.15	2.50	0.95	0.05			5.50	16.83
AUSTRIA									1.73
BELGIUM								0.00	0.00
BES ISLANDS									0.10
BRAZIL						0.25	5.80	5.83	32.13
BRUNEI DARUSSALAM									0.01
BULGARIA									0.38
CANADA							0.43	0.53	1.19
CHILE								3.08	6.55
CHINA								0.00	0.00
COLOMBIA			1.00				1.00	1.00	5.00
CROATIA			0.02						0.23
CYPRUS									0.02
CZECH REPUBLIC									0.79
DENMARK									22.19
EGYPT		5.97					0.22	0.22	6.63
ESTONIA			0.00					0.00	0.14
EU/NATO+		1.12	9.98	2.50			9.11	19.11	67.59
EUROPEAN UNION								4.27	5.96
FINLAND		0.12	0.01				0.26	0.37	8.00
FRANCE			0.00		0.00		0.11	1.16	12.02
GERMANY	0.06		0.17	0.02	1.23	0.06	0.15	10.92	171.02
GREECE								0.32	2.82
HUNGARY						0.27			0.84

INDIA								1.97	5.65
INDONESIA			0.30					1.25	2.81
IRELAND									4.54
ISRAEL							0.33	0.33	1.05
ITALY		0.35					0.08	4.72	7.18
JAPAN							0.13	0.18	0.49
JORDAN									1.05
KAZAKHSTAN									0.51
KOSOVO									0.02
KUWAIT								0.34	1.02
LATVIA									0.40
LITHUANIA		0.23						0.23	0.47
MALAYSIA							3.00	5.88	13.43
MALTA									0.04
MEXICO							0.35	0.35	1.40
MOLDOVA									0.04
MOROCCO								1.82	9.09
NORWAY			0.29						15.81
OMAN								0.51	1.01
PAKISTAN							11.89	11.89	38.61
POLAND			0.00						31.81
PORTUGAL									0.51
QATAR			0.33				0.08	3.58	8.23
ROMANIA					0.25				5.58
SAUDI ARABIA								0.55	1.12

SERBIA									0.01
SINGAPORE		0.04	3.00				10.68	10.70	35.16
SLOVAKIA									0.26
SLOVENIA									0.00
SOMALIA	0.08								0.23
SPAIN		0.02			0.00		0.14	0.18	4.11
SOUTH AFRICA									0.55
SOUTH KOREA	0.00		0.12		0.49	0.20	4.20	8.33	19.32
SURINAME									0.00
SWEDEN		0.28			0.00		0.75	0.36	3.43
SWITZERLAND				0.06					3.25
TAIWAN									10.25
THAILAND		0.29					0.00	0.30	0.60
TIMOR-LESTE									0.00
TÜRKIYE				0.08			0.17	1.59	3.80
VARIOUS	0.01			30.00			3.56	4.09	77.66
UNITED ARAB EMIRATES		0.01					0.19	0.73	1.92
UNITED KINGDOM		4.51	0.50				4.51	5.77	37.88
UNITED STATES		0.45	2.21	0.06	0.05	0.38	0.13	6.85	62.89
VIETNAM			0.03					0.09	0.12
Total	0.76	13.56	41.12	33.67	8.33	1.56	58.87	127.43	1867.95

Annexe 2 Evolution of the value of licences issued for the export of military goods from the Netherlands since 2000

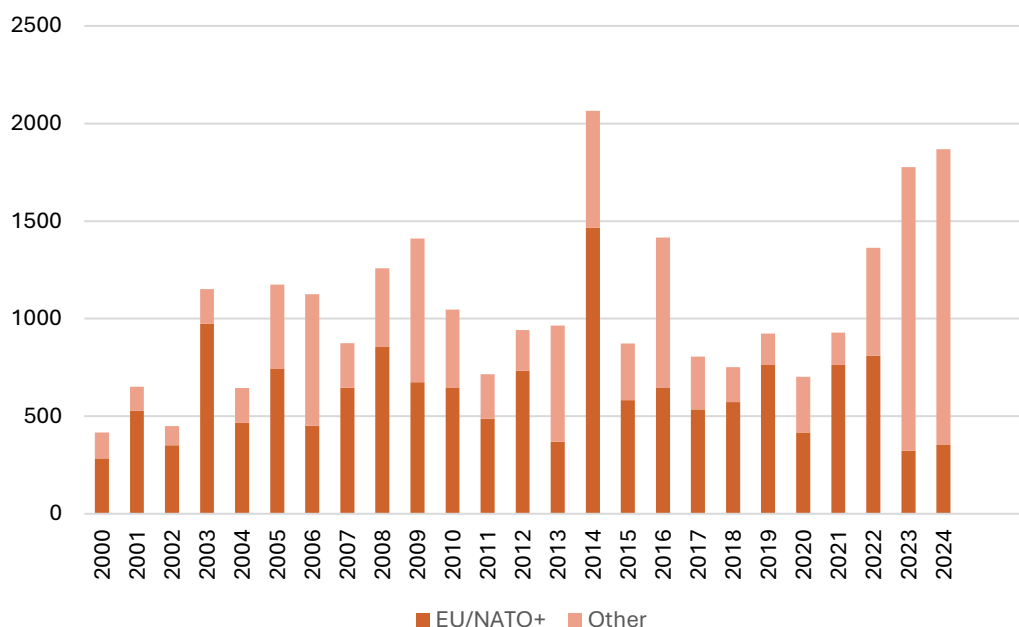


Figure 8. Value of licences issued, 2000-2024 (in € millions per year)

As of the report of 2015, in the table giving the value of licences issued for the permanent export of military goods by country of destination, the heading 'NATO other' is replaced by the heading 'EU/NATO+' for the purpose of showing the value of global licences. In 2022, 2023 and 2024 the EU/NAVO+ share fell due to the Netherlands' military support for Ukraine.

In 2024, the following 27 countries were members of the EU: Austria, Belgium, Bulgaria, Croatia, Cyprus, the Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden

In 2024, the following 31 countries were members of NATO: Albania, Belgium, Bulgaria, Canada, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Italy, Latvia, Lithuania, Luxembourg, Montenegro, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden (as of 7 March 2024), Türkiye, United Kingdom and United States.

Annexe 3: Use of general licences (military)

Overview of the use of general licences

NL003: Export (transfer) to armed forces of EU member states

NL004: Export (transfer) to certified recipients within the meaning of article 9 of Directive 2009/43/EC.

NL005: Export (transfer) for the purpose of demonstration, evaluation or exhibition

NL006: Export (transfer) for the purpose of repair, maintenance and servicing

NL007: Transit, originating from an allied country

NL008: Transit, with an allied country as final destination

NL009: Export to parties participating in the F-35 Lightning II programme

Table 9. Value of reported uses of general transfer licences issued in 2024 for the permanent export of military goods under NL003 (armed forces of EU member states, Norway, Iceland and the United Kingdom), by country of destination

Country of destination	Value (€ millions)	ML code(s)
Austria	2.9	6; 10
Belgium	0.04	11
Croatia	0.0065	10
Denmark	1.73	5; 10; 11; 21; 22
Finland	0.033	22
France	9.40	5; 21; 22
Germany	20.76	5; 6; 10; 11; 21; 22
Greece	1.51	5; 21; 22
Hungary	0.941	6; 11
Italy	1.1	5; 21; 22
Luxembourg	1.47	6; 11

Norway	0.55	7
Poland	0.161	5; 22
Portugal	0.07	5; 10
Spain	0.132	11; 17; 22
Sweden	0.117	6; 11; 21; 22
United Kingdom	2.1	6; 9; 21; 22
Total	43	

Table 10. Value of reported uses of general transfer licences issued in 2024 for the permanent export of military goods under NL004 (recipients are companies certified under Directive 2009/43/EC in EU member states, Norway, Iceland and the United Kingdom), by country of destination

Country of destination	Value (€ millions)	ML code(s)
Belgium	0.028	5
Denmark	0.555	4; 7
France	1.439	5; 21; 22
Germany	25.146	5; 6; 11; 15; 22
Portugal	0.001	5; 22
Sweden	4.5	6; 13
Total	31.68	

Table 11. Value of reported uses of general transfer licences issued in 2024 for the permanent export of military goods under NL005 (demonstration, evaluation or exhibition in EU member states, Norway, Iceland and the United Kingdom), by country of destination

Country of destination	Value (€ millions)	ML code(s)
Austria	0.312	1; 5; 15
Czech Republic	0.008	5
Denmark	0.413	5; 11; 13; 21
Estonia	0.582	5; 11
Finland	0.000003	13
France	4.95	5; 6; 9; 10; 11; 13; 15; 21; 22
Germany	1.02	5; 6; 11; 13; 15; 21; 22
Hungary	0.090	5; 18
Ireland	0.000001	13
Italy	0.017	5; 11; 13; 21
Lithuania	0.0001	13
Norway	0.000006	22
Poland	0.01	5; 13
Portugal	0.022	1; 21
Romania	0.004	5; 13
Spain	0.036	5; 10; 13
Sweden	0.146	5; 6; 15; 21; 22
United Kingdom	0.697	5; 9; 11; 13
Total	8.3	

Table 12. Value of reported uses of general transfer licences issued in 2024 for the permanent export of military goods under NL006 (repair, maintenance and servicing in EU member states, Norway, Iceland and the United Kingdom), by country of destination

Country of destination	Value (€ millions)	ML code(s)
Austria	0.00015	6
Belgium	1.8	5; 15
Canada	0.086	17
Czech Republic	0.00741	6
Denmark	1.913	5; 6; 10; 11; 16
Finland	0.125	6
France	3.8	5; 6; 9; 10; 11; 15; 16; 21
Germany	21.61	5; 6; 9; 10; 11; 15; 21; 22
Greece	0.938	5
Italy	2.8	5; 11; 15
Lithuania	0	11
Poland	0.02	5
Portugal	0.160	5
Slovenia	0.001243	6
Spain	1.279	5; 10; 11; 15
Sweden	0.322	5; 6; 11; 15; 16
United Kingdom	11.48	5; 6; 9; 11; 15; 17
United States	0.059	5; 10; 15
Total	46.44	

Table 13. Value of reported uses of general transfer licences issued in 2024 for the permanent transit of military goods under NL007 (originating from an allied country), by country of destination

Country of destination	Value (€ millions)	ML code(s)
Bahrain	0.064	10
Brazil	6.5	6; 8; 10; 11; 14
Chile	4.77	5; 9; 13
China	0.0071	11
Colombia	0.286	10
Curaçao	0.028	9
Ecuador	0.091	7; 10
Ghana	0.023	13
India	0.50	11
Indonesia	0.51	5
Kenya	0.370	13
Malaysia	4.1	10; 11
Pakistan	4.97	10; 11
Peru	0.879	9; 11; 15
Qatar	0.038	11
Singapore	0.388	6; 11
South Africa	1.365	5; 6; 10; 15
South Korea	0.09	5; 11
Switzerland	0.057	5
Taiwan	0.037	11
Thailand	0.012	10; 11
Uganda	0.795	5; 10

United Arab Emirates	0.041	11
United States	0.108	3; 10
Total	26.07	

Table 14. Value of reported uses of general transfer licences issued in 2024 for the permanent transit of military goods under NL008 (allied country as final destination), by country of destination

Country of origin	Value (€ millions)	ML code(s)
Austria	1.9	4; 11
Belgium	0.376	1; 4; 10; 11
Bulgaria	0.053	10; 11
Canada	1.2	1; 5; 6; 10; 11; 16
Curaçao	0.704	17
Croatia	0.013	10
Czech Republic	0.211	13
Denmark	0.092	5; 11; 13
Estonia	5.167	3
Finland	1.159	6; 10; 11
France	1.318	8; 10; 11
Germany	152.74	2; 3; 4; 5; 6; 7; 10; 11; 13
Greece	0.942	11; 14
Hungary	0.079	10; 11
Ireland	0.771	3
Israel ⁴⁴	0.028	5

⁴⁴ This export was in violation of the conditions of the applied general licence that can only be used for transshipment to Australia, Japan, New Zealand, Switzerland, or a member state of the EU or NATO (with the exception of Türkiye).

Italy	1.4	5; 8; 10; 11
Japan	12.339	2; 11; 13
Luxembourg	4.4	4; 10; 11; 14; 15
Norway	0.669	4; 9; 10; 11; 16
Poland	0.725	1; 3; 10; 11; 13; 14
Romania	0.007	1
Singapore	10.289	2
Spain	4.277	10; 11; 17
Sweden	23.3	4; 10; 11; 14; 21
Switzerland	3.876	4; 10
United Kingdom	4.781	4; 6; 10; 11; 13; 14; 17
United States	35.885	1; 4; 5; 6; 9; 10; 11; 14; 15; 16; 17; 21; 22
Total	268.75	

Table 14. Value of reported uses of general transfer licences issued in 2024 for the permanent export of military goods under NL009 (F-35 Lightning II), by country of destination

Country of destination	Value (€ millions)	ML code(s)
Australia	0.774	10; 12; 17
Belgium	0.045	10
Canada	0.761	10
Denmark	0.760	5; 10; 11; 17
Finland	0.408	18

After this became apparent from reporting data, an investigation was opened into the exporter in question, which is still ongoing.

Greece	0.041	10
Guam	0.208	10
Israel ⁴⁵	0.277	5; 10; 17
Italy	24.43	5; 10; 17; 19
Japan	3.41	5; 10; 17
Norway	1.3	5; 10; 11; 17
Poland	0.000058	10
Singapore	0.271	10
South Korea	0.445	10
United Kingdom	8.359	5; 10; 11; 12; 17
United States	237.399	4; 5; 10; 11; 14; 15; 17; 19
Total	278.9	

Table 15. Value of reported uses of general transfer licences issued in 2024 for the permanent transit of military goods under NL009 (F-35 Lightning II), by country of destination

Country of Destination	Value (€ millions)	ML code(s)
Australia	0.238	10
Bahrain	0.068	10
Denmark	0.0052	10
Israel ⁴⁶	0.067	10

⁴⁵ Exports under general licence NL009 with Israel as their final destination took place prior to the judgment of the Hague Court of Appeal of 12 February 2024. In line with this judgment, general licence NL009 was modified in such a way that it can no longer be used for export or transshipment from the Netherlands to Israel.

⁴⁶ Exports under general licence NL009 with Israel as their final destination took place prior to the judgment of the Hague Court of Appeal of 12 February 2024. In line with this judgment, general licence NL009 was modified in such a way that it can no longer be used for export or transshipment from the Netherlands to Israel.

Italy	0.023	10
Japan	0.084	10; 18
Norway	23.890	10; 18
South Korea	0.011	10
United Kingdom	9.463	10
United States	170.014	10; 18
Total	203.87	

Annexe 4: Transit of Military Goods

Table 17. Value (in € millions) of licences issued in 2024 for the transit of military goods

Country of destination	ML1	ML2	ML3	ML6	ML17	Total (in € millions)
Austria	0.00	0.00				0.00
Estonia				0.32	0.32	0.63
Guatemala	0.08					0.08
Slovenia				0.91		0.91
Ukraine		0.08	7.58	42.25		49.91
United Arab Emirates				0.60		0.60
Total	0.08	0.08	7.58	44.07	0.32	52.12

Annexe 5: Brokering services for military goods

This annexe contains an overview of the licences issued for brokering services. The overview indicates the type of good the brokering services related to, plus the good's country of origin and country of final destination. Brokering means that the goods do not cross Dutch territory, but a Dutch party does play an enabling role in the transaction. There is a licence requirement for this service. The value of the brokering service is not always known because the services are sometimes part of a larger contract that also covers the supply of goods and technology. Similarly, there is not always a value linked to the provision of brokering services, as companies may also provide such a service for the benefit of their own operations, thus making it cost neutral. Companies are asked to specify the value of the brokering service as accurately as possible in the licence application.

Table 18. Licences issued for brokering services for military goods in 2024

Country of final destination	Country of origin	ML	Goods for which brokering services were provided	Value of brokering service ⁴⁷ (in euros)
Ukraine	Czech Republic	ML3a	Ammunition	1,260,000
Ukraine	Spain	ML9a1	Vehicles and parts	6,336,000
Ukraine	Czech Republic	ML4a	Grenades	2,177,335
United Kingdom	Singapore	ML18a	Brokering services for part of a support construction for a submarine during the construction phase and/or in dry dock	1,550,979
Spain	United States	ML11a	Parts for inspection equipment for tubes	15,723
Ukraine	Czech Republic	ML2a	Howitzers and parts	41,490,900
Ukraine	Czech Republic	ML3a	Ammunition	4,850,000
Austria	Brazil	ML10a	Military transport aircraft, including parts and fittings	769,800,000
Mexico	United States	ML11a	Electronic equipment	35,365
Ukraine	Czech Republic	ML10c	UAVs	25,612,646

⁴⁷ This is not the value of the goods but of the brokering service provided.

Ukraine	Sweden	ML9a1	Patrol vessels	5,773,273
Ukraine	France	ML2a; ML3a	Mortars and grenades	6,501,720
EU/NATO+	United States	ML2a; ML2c; ML9a; ML9c; ML11; ML13a; ML13b; ML16; ML21a; ML22a; ML4b; ML4c; ML5; ML10	Brokering services for military goods, software and technology	0
Ukraine	United States	ML1d5	Weapon sights and parts	61,537,274
Ukraine	Czech Republic	ML2a	Howitzers	17,752,500
Portugal	Various	ML10a	KC-390 aircraft parts	127,651,924
United States	United States	ML11a	Inspection equipment for tubes	92,876
Ukraine	United Kingdom	ML10c	UAVs	15,037,535

Annexe 6: Licence application denials for military goods

Licence application denials are also shared with EU partners pursuant to Article 4 of Common Position 2008/944/CFSP defining common rules governing control of exports of military goods and technology.

Table 18. Licence application denials for the export of military goods in 2024

Country of final destination	Brief description	Number of items	Recipient	End user	Date of denial	Reason for denial (criteria)
Israel	Ammunition	84,000	Xcalibre Arms Ltd.	Unknown, destined for local resale	15 May 2024	7
Guinea	M813 Lorry	1	Private end user	Private end user	16 May 2024	7
Israel	Ballistic helmets	52	Yakhin Hakal Ltd.	Israeli Defence Forces	13 June 2024	2, 4, 6, 7
Israel	Bullet-proof plates	436	Yakhin Hakal Ltd.	Israeli Defence Forces	13 June 2024	2, 4, 6, 7

Israel	Thermal scopes	50	Troya Tech Defense Ltd.	Israeli Defence Forces	13 June 2024	2, 4, 6, 7
Israel	Image intensifiers	40	Troya Tech Defense Ltd.	Israeli Defence Forces	13 June 2024	2, 4, 6, 7
The Congo	UAV	1	Telesol Networks Ltd.	Maison Militaire	27 August 2024	2, 3, 7
Israel	Image intensifiers	40	Troya Tech Defense Ltd.	Israeli Prison Service	9 October 2024	2, 4, 6, 7
Israel	Transport helicopter parts	5	Integrated Procurement Technologies (IPT)	Israeli Defence Forces	5 December 2024	2, 4, 6, 7