

A Tale of Two Systems: Alignment, Divergence and Coordination in EU and US Dual-use Export Controls

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ABSTRACT

Cooperation between the United States and the European Union in dual-use export controls has increased in recent years, including through the Trade and Technology Council (TTC) and the alignment of trade restrictions on Russia. However, in substance and focus there remain considerable differences in the US and EU dual-use export control systems. The United States has a unified set of dual use export controls while the EU has a multi-level system in which legislation is adopted at the EU level but implementation is left to member states. As a result, coordination in many areas – including the content of control lists, the enforcement of trade restrictions on Russia, and US re-export controls – continues to take place at both the US-EU and US-EU member state levels. This paper compares key aspects of the US and EU systems of dual-use export controls, examines the different processes of coordination, and assesses the potential for deeper cooperation and alignment.

European Union | USA | Transatlantic relations | Dual-use | Technologies | Foreign trade | Russia | China | Arms trade

keywords

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Introduction

This paper compares the content of the regulatory systems that the European Union and United States maintain for controlling international transfers of dual-use items, i.e. goods, materials and technologies that may be used for both civilian and military purposes, and examines US-EU coordination efforts. The regulatory systems that states maintain, hereafter referred to as “export controls”, consist of several elements. These include (i) *policy objectives* (i.e. the overarching goals that the system is intended to achieve), (ii) a *control list* (i.e. a list of items that are subject to control), (iii) a *licensing system* (i.e. a set of procedures administering licensing applications for certain activities, typically including export, brokering and transit/transshipment), (iv) *assessment processes* (i.e. criteria and decision-making mechanisms for determining which licences are approved), and (v) *enforcement mechanisms* (i.e. systems for ensuring that companies comply with export control provisions). Aspects of these elements – particularly the control list – are based on broader multilateral obligations to which the EU and United States both subscribe. Other elements – particularly the enforcement mechanisms – are not subject to detailed multilateral standards and are shaped more by domestic factors.

For the purposes of this paper, export controls are viewed as connected to, but distinct from, sanctions measures. Sanctions measures can include banking restrictions, travel bans, asset freezes and prohibitions on transfers of dual-use items to or from a particular destination. Aspects of these transfer prohibitions are often implemented via a states’ export control system. However, while export controls are usually unlimited, applicable to all recipients and in pursuit of general policy objectives and norms, sanctions are targeted and seek to achieve specific behavioural changes by the sanctioned party. Maintaining this distinction is challenging. Since February 2022 the main focus for US and EU export controls

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has been implementing the prohibitions on transfers of dual-use items to Russia included in the sanctions measures they have imposed. In addition, the way the United States is using export controls to restrict transfers of advanced technologies to China looks increasingly indistinguishable from sanctions measures.

Any attempt to compare the US and EU systems of export controls is constrained by differences in the structure of their political and legal systems and the ways export controls are managed within those systems. In particular, the way power is allocated and exercised at the institutional and member state levels in the EU and the federal government and state levels in the US, and how responsibility for export controls is distributed between those levels, differs significantly. These differences both inform and constrain EU-US coordination on export controls. This coordination has deepened significantly in recent years, particularly via the Trade and Technology Council (TTC), which was established in June 2021. However, the complexity and the differences in US and EU export controls means that coordination involves multiple US agencies and EU institutions and takes place not only at the US-EU level but also bilaterally between the US and individual EU member states.

Sections II and III outline the legal basis and administrative frameworks of the US and EU systems of export controls. Section IV compares three key aspects of their export controls: their policy objectives, control lists and enforcement mechanisms. Section V focuses on five areas that have been a focus of EU-US coordination on export controls, mapping efforts at both the US-EU and US-EU member state levels. Section VI presents the main conclusions and assesses the potential for deeper alignment and coordination between the EU and United States on export controls.

1. US export controls

Under the US Constitution, Congress is authorised to regulate all aspects of commerce with foreign states. Congress has, in turn, regularly delegated authority to the president to “regulate exports for a variety of national security, foreign policy, and economic purposes”.¹ In 2018 the US Congress adopted the Export Control Reform Act (ECRA) after a prolonged process of review and consultation. The ECRA was the first piece of US legislation that allocates authority to the executive branch of the US government to regulate dual-use exports on a permanent basis. Previous legislation had been adopted on a time limited or emergency basis. The ECRA authorises the president to control exports of dual-use items to protect US national security and further its foreign policy interests.² The main set of tools which

¹ Christopher A. Casey, “Export Controls – International Coordination: Issues for Congress”, in *CRS Reports*, No. R47684 (8 September 2023), p. 1, <https://crsreports.congress.gov/product/details?prodcode=R47684>.

² Oliver Bräuner, Mark Bromley and Mathieu Duchâtel, “Western Arms Exports to China”, in *SIPRI Policy Papers*, No. 43 (January 2015), p. 5, <https://www.sipri.org/node/1877>.

are used to administer these controls are outlined in the Export Administration Regulations (EAR). The EAR control both exports of dual-use items from the United States and the re-export of US origin items and transfers to non-US citizens that take place within the United States.³ The EAR are administered by the US Bureau of Industry and Security (BIS) within the US Department of Commerce. Other US regulations impose controls on exports of certain specific types of dual-use items. For example, the US Departments of Energy has a role in administering certain nuclear-related exports and the US Department of Treasury administers certain aspects of the prohibitions on transfers of dual-use items adopted under US sanctions measures.⁴

2. EU export controls

The EU has established a common legal framework for controls on the export, brokering, transit and trans-shipment of dual-use items. Its central element is the EU Dual-use Regulation which is directly applicable law in all member states and was most recently recast as Regulation (EU) 2021/821 which entered into force in 2021.⁵ The EU Anti-torture Regulation is another EU regulation creating export controls, but only for dual-use items which may be used in torture and capital punishment.⁶ Until 2009 the process of assessing and updating the EU's export controls was the joint responsibility of the Commission and the Council. However, with the entry into force of the Lisbon Treaty the European Parliament became co-legislator (together with the Council) with a shared responsibility for discussing proposed amendments and ultimately adopting EU legislation following an initial proposal by the Commission.⁷ The Dual-use Regulation is part of the EU's Common Commercial Policy (CCP), an area of "exclusive" EU competence, meaning power has been devolved to the supranational level. However, the Dual-use Regulation includes specific provisions that delegate responsibility to the member states. This means that implementation – i.e. operating the licensing system and taking individual decisions to grant or deny licenses – and enforcement – i.e. the detection, investigation and prosecution of violations – is a national prerogative of

³ David Addis and Peter Lichtenbaum, *Microsoft Office 365 and U.S. Export Controls*, Covington, 1 December 2016, <https://query.prod.cms.rt.microsoft.com/cms/api/am/binary/RE1s5kI>.

⁴ US Department of State, *Overview of U.S. Export Control System*, 8 March 2011, <https://2009-2017.state.gov/strategictrade/overview/index.htm>.

⁵ European Parliament and Council of the EU, *Regulation (EU) 2021/821 of 20 May 2021 Setting up a Union Regime for the Control of Exports, Brokering, Technical Assistance, Transit and Transfer of Dual-use Items (Recast)*, <https://eur-lex.europa.eu/eli/reg/2021/821/oj>.

⁶ European Parliament and Council of the EU, *Regulation (EU) 2019/125 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*, <https://eur-lex.europa.eu/eli/reg/2019/125/oj>.

⁷ European Parliament website: *Ordinary Legislative Procedure*, <https://www.europarl.europa.eu/olp/en/ordinary-legislative-procedure/overview>.

the member states.⁸ This also means that within the constraints of EU and national laws, there is variation in the interpretation and application of certain provisions and member states may go beyond certain provisions in their national legislation.⁹ The Commission can create guidance documents on the implementation of certain aspects of the EU's export control system and it has increasingly administered public consultations open to stakeholders from across the EU to provide input and feedback to certain policy or guidance proposals.

3. Comparison of key aspects

3.1 Policy objectives

According to the US government, the underlying objectives of its export controls are “to advance national security, foreign policy, and economic objectives by ensuring an effective export control and treaty compliance system, and promoting continued U.S. strategic technology leadership”.¹⁰ The inclusion of economic considerations – and the extent to which they guide US export controls – has been a source of tension and debate. Since the late 2010s the United States has used its export controls to block transfers of advanced technologies to China and specific Chinese entities – e.g. ZTE Corporation and Huawei – and employed diplomatic and legal measures to persuade or require foreign companies and states to adopt similar measures.¹¹ While the United States has argued that the controls are aimed at preventing the unauthorised re-export of US technology or limiting transfers of dual-use technologies that might benefit China’s military, Beijing has maintained that they are focused on ensuring US economic and technological superiority.¹² This period has also seen an expansion in the United States’ long-standing use of export controls to address human rights concerns, with a particular emphasis on regulating the trade in cyber-surveillance tools and targeting Chinese companies

⁸ European Commission DG Trade website: *Exporting Dual-use Items*, https://policy.trade.ec.europa.eu/node/1021_en.

⁹ European Commission, *Information Note: Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 Setting up a Union Regime for the Control of Exports, Brokering, Technical Assistance, Transit and Transfer of Dual-use Items: Information on Measures Adopted by Member States in Conformity with Articles 4, 5, 6, 7, 8, 9, 11, 12, 22 and 23*, 15 June 2023, [https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex:52023XC0615\(03\)](https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex:52023XC0615(03)).

¹⁰ US International Trade Administration website: *US Export Controls*, <https://www.trade.gov/us-export-controls>.

¹¹ US Bureau of Industry and Security, “Addition of Entities to the Entity List”, in *Federal Register*, 3 August 2016, <https://www.federalregister.gov/d/2016-05104>; US Bureau of Industry and Security, “Addition of Entities to the Entity List”, in *Federal Register*, 21 May 2019, <https://www.federalregister.gov/d/2019-10616>; and US Department of Commerce, *Commerce Implements New Export Controls on Advanced Computing and Semiconductor Manufacturing Items to the People’s Republic of China (PRC)*, 7 October 2022, https://www.bis.doc.gov/index.php/component/docman/?task=doc_download&gid=3158.

¹² See Mark Bromley, Selma Mustafić and Jingdong Yuan, “China Takes Aim at the Export Control Regimes: Targeted Critique or Misguided Attack?”, in *WorldECR*, No. 123 (October 2023).

and individuals involved in the oppression of the Uighur people, the Turkic and Muslim minority of the Xinjiang region.¹³

When it was established in the 1990s, the main goal of the EU's system of export controls was implementing internationally agreed obligations in the field of weapons of mass destruction (WMD) non-proliferation.¹⁴ The adoption and evolution of EU export controls was also shaped by the application of single market principles to the trade in dual-use items by aligning EU member states' export controls and reducing intra-community trade barriers. During the 2021 recast, these goals were expanded to include a more explicit focus on controlling transfers of emerging technologies.¹⁵ Due mainly to the influence of the European Parliament, the recast also led to the inclusion of a focus on regulating the trade in cyber-surveillance tools.¹⁶ In June 2023 the Commission published a draft version of a European Economic Security Strategy which called for the EU to strengthen the oversight of transfers of emerging technologies and create more harmonised export controls.¹⁷ Although it was not mentioned directly, the initiative was largely driven by concerns about China's influence over key areas of the EU's economy and its ability to access military-relevant dual-use technologies.¹⁸ In January 2024 the Commission proposed five new initiatives to strengthen economic security, including a white paper on export controls which proposed the creation of an EU "forum" for political coordination on export controls.¹⁹

3.2 Control lists

Most of the dual-use items covered by US export controls are outlined in the Commerce Control List (CCL). The CCL is updated annually and the main source for its contents are the control lists of the multilateral export control regimes – i.e. the Australia Group (AG), the Missile Technology Control Regime, the Nuclear Suppliers Group (NSG), and the Wassenaar Arrangement on Export Controls on Dual-use Goods and Technologies (WA). The regimes are informal groups of states that agree common guidelines and control lists for items to which export controls

¹³ Christopher A. Casey, "Export Controls – International Coordination", cit.

¹⁴ See Anna Giulia Micara, "Current Features of the European Union Regime for Export Control of Dual-use Goods", in *Journal of Common Market Studies*, Vol. 50, No. 4 (July 2012), p. 578-593, DOI 10.1111/j.1468-5965.2012.02249.x.

¹⁵ Mark Bromley and Kolja Brockmann, "Implementing the 2021 Recast of the EU Dual-Use Regulation: Challenges and Opportunities", in *EU Non-Proliferation and Disarmament Papers*, No. 77 (September 2021), <https://www.sipri.org/node/5521>.

¹⁶ Ibid.

¹⁷ European Commission, *European Economic Security Strategy* (JOIN/2023/20), 20 June 2023, <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex:52023JC0020>.

¹⁸ Alexandra Brzozowski and Luca Bertuzzi, "Leak: EU Eyes Trade Defence Tools to Protect Industrial, Defence Sectors from China", in *Euractiv*, 20 June 2023, <https://www.euractiv.com/?p=1941864>.

¹⁹ European Commission, *White Paper on Export Controls* (COM/2024/25), 24 January 2024, p. 13, <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex:52024DC0025>.

should apply.²⁰ The United States is a founding member of the four regimes and a key focus of US export controls is ensuring that items are only added to the CCL if they have also been adopted by other states at the multilateral level through the regimes. At the same time, the United States is also willing to adopt unilateral national controls if its security or economic interests are at stake or there are specific normative concerns. For example, the United States includes certain crime control and detection items on the CCL that are not controlled by the regimes.²¹ The United States has also been increasingly willing to utilise or establish new mechanisms to create list-based controls in cases where agreement at the regime level is not possible. Russia is a member of all of the regimes besides the AG and reportedly vetoed the adoption of new control list categories at the WA in 2023.²² Unilateral US efforts have resulted in the adoption of national controls on transfers of advanced semi-conductors and related manufacturing equipment to China (see below).²³ Most recently, national controls on software associated with advanced AI applications have been proposed in the US Congress.²⁴

Most of the dual-use items covered by EU export controls are outlined in Annex I of the Dual-use Regulation (the “EU Dual-use list”). The EU Dual-use list is updated annually and is based exclusively on the regimes’ control lists.²⁵ Most EU member states participate in all of the regimes and the Commission is a full member of the AG and a permanent observer to the NSG.²⁶ EU member states are able to adopt national controls on items that do not appear in the EU Dual-use list based on public security, human rights and, following the 2021 recast, terrorism concerns. The 2021 recast also introduced a system of “transmissible controls” meaning that a national control adopted by one member state can be used by another member state to impose licensing requirements and potentially restrict exports of those items. During 2023 and 2024 several member states have used the new mechanism to adopt controls on strategic or emerging technologies such as quantum computers,

²⁰ Australia Group website: *Australia Group Common Control Lists*, <https://www.dfat.gov.au/publications/minisite/theaustraliagroupnet/site/en/controllists.html>; Missile Technology Control Regime (MTCR) website: *MTCR Guidelines and the Equipment, Software and Technology Annex*, <https://www.mtcr.info/en/mtcr-guidelines>; NSG, *Guidelines for Nuclear Transfers (NSG Part 1 Guidelines)*, July 2023, https://www.nsg-online.org/images/Files/Updated_control_lists/Argentina_2023/NSG_Part_1_Rev_July_2023_Clean.pdf; Wassenaar Arrangement website: *Control Lists*, <https://www.wassenaar.org/control-lists>.

²¹ US Bureau of Industry and Security, “Control Policy – CCL Based Controls”, in *Code of Federal Regulations*, Title 15, Part 742, <https://www.ecfr.gov/current/title-15/part-742>.

²² Jasper Helder et al., “International Unilateral Export Controls – An Increased Focus on Advanced Technologies”, in *Akin Insights*, 5 April 2024, <https://www.akingump.com/en/insights/alerts/international-unilateral-export-controls-an-increased-focus-on-advanced-technologies>.

²³ Christopher A. Casey, “Export Controls – International Coordination”, cit.

²⁴ US Foreign Affairs Committee, *Bipartisan Coalition Introduces Monumental Bill Giving Admin Authority to Export Control Advanced AI Systems*, 10 May 2024, <https://foreignaffairs.house.gov/?p=47210>.

²⁵ European Parliament and Council of the EU, *Regulation (EU) 2021/821*, cit.

²⁶ Aside from Cyprus (which is not a member of the WA) and Estonia, Latvia, Lithuania, Malta, Romania, Slovenia and Slovakia (which are not members of the MTCR) all EU member states participate in all four regimes.

additive manufacturing equipment and semi-conductor production equipment (see below).²⁷ During the 2021 recast and in the January 2024 white paper the Commission indicated support for creating an “autonomous” EU control list and giving itself a more direct role in determining which items to include. This would allow for EU-wide controls on items that are not captured by the regimes’ lists and avoid the current patchwork of national controls.²⁸ However, many member states have indicated that they wish to keep the regimes as the basis for the EU Dual-use list and oppose giving the Commission a bigger role in this area.²⁹

3.3 Enforcement mechanisms

The United States has multiple programmes in place aimed at ensuring that its export controls are enforced and frequently uses legal measures such as fines, prison sentences and debarments to penalise violations.³⁰ Depending on the specific laws and regulations and where the offences take place, these enforcement efforts are undertaken by multiple US government agencies, including the Department for Homeland Security (DHS), the Federal Bureau of Investigations (FBI) and the Department of Commerce. These efforts have expanded in recent years, particularly in relation to the implementation of the trade restrictions imposed under the Russia sanctions. In early 2023 the United States stated that it was expanding the resources it devotes to the enforcement of sanctions and export controls, including through the establishment of the Disruptive Technology Strike Force and the addition of 25 new prosecutors working in this area.³¹ Another key aspect of the US enforcement mechanisms is that the United States asserts that its export controls, along with its sanctions and many other US laws, apply extraterritorially. This means that the re-export of items of US origin on the CCL are subject to control under the EAR.³² In addition, the foreign-produced direct product rule (FDPR) allows BIS to prohibit

²⁷ European Commission, *Compilation of National Control Lists under Article 9(4) of Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 Setting up a Union Regime for the Control of Exports, Brokering, Technical Assistance, Transit and Transfer of Dual-use Items*, 20 October 2023, <http://data.europa.eu/eli/C/2023/441/oj>.

²⁸ European Commission, *White Paper on Export Controls*, cit., p. 12-13.

²⁹ See Swedish Ministry of Foreign Affairs, *Vitbok om exportkontroll av produkter med dubbla användningsområden* [White paper on export control of dual-use products], 27 February 2024, https://www.riksdagen.se/sv/dokument-och-lagar/dokument/_hb06fpm39; and Netherlands Government, *Kabinetsappreciatie witboek over exportcontrole* [Cabinet appreciation white paper on export controls], 1 March 2024, <https://www.rijksoverheid.nl/documenten/publicaties/2024/03/01/appreciatie-witboek-over-exportcontrole>.

³⁰ See Paul K. Kerr and Christopher A Casey, “The U.S. Export Control System and the Export Control Reform Act of 2018”, in *CRS Reports*, No. R46814 (7 June 2021), p. 15-16, <https://crsreports.congress.gov/product/details?prodcode=R46814>.

³¹ US Department of Justice, *Deputy Attorney General Lisa Monaco Delivers Remarks at American Bar Association National Institute on White Collar Crime*, 2 March 2023, <https://www.justice.gov/opa/speech/deputy-attorney-general-lisa-monaco-delivers-remarks-american-bar-association-national>.

³² Meredith Rathbone and Hena Schommer, “Export Controls in the United States”, in *Global Investigations Review, The Guide to Sanctions*, 3rd ed., 8 July 2022, <https://globalinvestigationsreview.com/guide/the-guide-sanctions/third-edition/article/export-controls-in-the-united-states>.

foreign manufacturers from exporting foreign-made goods that are produced using controlled US technology.³³

In the EU, all matters relating to the detection, investigation and prosecution of export control violations are the responsibility of individual member states and national efforts in these areas are far more limited and fragmented than in the United States. While there have been prosecutions for export control violations, many member states have limited experience with the investigation and prosecution of export control offences.³⁴ There have been efforts to expand the level of coordination among EU member states in export control enforcement and align national penalties. Under the 2021 recast the EU established an “Enforcement Coordination Mechanism” to bring together member state officials to exchange information on “the detection and prosecution of unauthorised exports of dual use items”. In April 2024 the EU adopted a new directive aimed at aligning penalties for violations of EU sanctions measures, including those related to exports of dual-use items.³⁵ In contrast to the United States, the EU has always been sceptical towards the extraterritorial application of export controls. The only aspects of the Dual-use Regulation that apply outside the EU are controls on “technical assistance” provided in connection with a WMD programme, a military end-use in an embargoed destination, or an illegally exported military item.³⁶

4. Transatlantic cooperation

4.1 Coordination prior to regime meetings

The multilateral export control regimes are the main forums for deliberations on which dual-use items to include in the export control lists adopted by many states. Coordination between EU member states and the United States prior to regime meetings is therefore particularly important. EU member states coordinate regularly through the Council Working Party on Dual-use Goods.³⁷ The EU and the United States meet regularly to coordinate on export controls. The TTC created a new forum in which coordination can take place. One of the TTC’s ten working

³³ Joop Voetelink, “The Extraterritorial Reach of US Export Control Law: The Foreign Direct Product Rules”, in *Journal of Strategic Trade Control*, Vol. 1, No. 1 (2023), <https://doi.org/10.25518/2952-7597.57>.

³⁴ Sibylle Bauer and Mark Bromley, *Detecting, Investigating and Prosecuting Export Control Violations: European Perspectives on Key Challenges and Good Practices*, Stockholm, SIPRI, 2019, <https://www.sipri.org/node/4971>.

³⁵ European Parliament and Council of the EU, *Directive (EU) 2024/1226 of 24 April 2024 on the Definition of Criminal Offences and Penalties for the Violation of Union Restrictive Measures*, <http://data.europa.eu/eli/dir/2024/1226/oj>.

³⁶ Covington, “An Overview of the Recast EU Dual Use Regulation”, in *Covington Alerts*, 21 September 2021, <https://www.cov.com/en/news-and-insights/insights/2021/09/an-overview-of-the-recast-eu-dual-use-regulation>.

³⁷ Council of the EU website: *Working Party on Dual-Use Goods*, <https://www.consilium.europa.eu/en/council-eu/preparatory-bodies/working-party-dual-use-goods>.

groups focuses on export controls and it is tasked specifically with “(t)echnical consultations on current and upcoming legislative and regulatory developments to promote the global convergence of controls”.³⁸ However, in many cases coordination on specific topics takes place among smaller groups of states. There is no dedicated coordination between the United States and the EU collectively prior to regime meetings. Even though several of the controls adopted through national controls by the United States or EU member states have also been proposed in the regimes, there is currently no coordination that could enable the EU and the United States to speak in the regime meetings with a more unified voice. Even among EU member states such coordination is sometimes lacking, as is noted in the Commission white paper on export controls.³⁹

4.2 Trade restrictions on Russia

In response to Russia’s full-scale invasion of Ukraine in 2022, the United States, the EU, EU member states and other like-minded states have adopted trade restrictions on the export of a wide range of dual-use items to Russia and Belarus. Coordination on the coverage of these controls has been a key focus of the TTC, along with efforts to address “enforcement and circumvention risks”.⁴⁰ However, the primary vehicle for coordinating these efforts is the Global Export Control Coalition (GECC), which consists of 39 states that have agreed to “similarly stringent export controls” on Russia and Belarus.⁴¹ The group includes all 27 EU member states but not the EU itself. Coordination efforts are also taking place via the “G7 Enforcement Coordination Mechanism”.⁴² France, Germany and Italy are members of the G7 and the EU is a “non-enumerated member”. Since 2023, detailed information exchange and enforcement coordination with regards to the trade restrictions on Russia have also been taking place via the Export Enforcement Five or “E5” which includes Australia, Canada, New Zealand, the United Kingdom and the United States.⁴³ No EU member state or the EU take part in these meetings.

³⁸ Trade and Technology Council, *EU-US Trade and Technology Council Inaugural Joint Statement*, Pittsburgh, 29 September 2021, https://ec.europa.eu/commission/presscorner/detail/en/statement_21_4951.

³⁹ European Commission, *White Paper on Export Controls*, cit., p. 10-11.

⁴⁰ Trade and Technology Council, *Joint Statement EU-US Trade and Technology Council of 31 May 2023 in Lulea, Sweden*, https://ec.europa.eu/commission/presscorner/detail/en/statement_23_2992.

⁴¹ These are the 27 EU member states, Australia, Canada, Iceland, Japan, Liechtenstein, New Zealand, Norway, South Korea, Switzerland, Taiwan, the United Kingdom and the United States.

⁴² US Department of the Treasury, *G7 Enforcement Coordination Mechanism Deputies Meeting, 27 April 2023*, <https://home.treasury.gov/node/971361>.

⁴³ US Bureau of Industry and Security, *Five Eyes Partners Agree to Formalize Cooperation on Export Control Enforcement*, 28 June 2023, https://www.bis.doc.gov/index.php/component/docman/?task=doc_download&gid=3294.

4.3 Transfers of advanced technologies to China

There have also been attempts to use the TTC to coordinate controls on transfers of advanced technologies to China. The outcome document of the first TTC meeting in 2021 contained thinly veiled references to the need to identify and, if necessary, restrict transfers of certain advanced technologies to China.⁴⁴ However, these concerns have been less visible at subsequent TTC meetings and the outcome document of the 2023 TTC focused more on addressing concerns that Beijing has been raising about the use of export controls to pursue national economic objectives than on increasing restrictions on technology transfers to China.⁴⁵ More substantive coordination on this issue has been occurring at the US-EU member state level. In early 2023 the United States, the Netherlands and Japan agreed to adopt new controls on exports of production equipment for advanced semiconductors.⁴⁶ The Netherlands has used Article 9 of the Dual-use Regulation when adopting these controls, which means that other EU member states can restrict exports of the same items (see above).⁴⁷

4.4 Transfers of technologies that threaten human rights

The use of exports controls to restrict transfers of technologies that might be used to commit human rights abuses was also one of the initial areas of focus for the TTC. One of its ten working groups focused on the “misuse of technology threatening security and human rights”.⁴⁸ However, this issue dropped off the agenda during later TTC meetings. The more substantive US efforts to establish a multilateral agreement in this area have taken place through alternative channels. On the final day of the inaugural Summit for Democracy in 2021 Australia, Denmark, Norway and the United State launched the Export Controls and Human Rights Initiative

⁴⁴ The outcome document of the 2021 TTC meeting noted that the EU and US “share concerns that technology acquisition strategies, including economic coercive measures, and civil-military fusion policies of certain actors undermine security interests, and challenge the objective assessment of risks by the competent authorities and the effective implementation of rules-based controls in line with internationally-agreed standards.” Trade and Technology Council, *EU-US Trade and Technology Council Inaugural Joint Statement*, cit.

⁴⁵ The outcome document of the 2023 TTC meeting committed the EU and US to the promotion of “an environment in which science, technology and legitimate research collaboration can flourish”. Trade and Technology Council, *Joint Statement EU-US Trade and Technology Council of 31 May 2023*, cit.

⁴⁶ Alexandra Alper and David Shepardson, “U.S. Official Acknowledges Japan, Netherlands Deal to Curb Chipmaking Exports to China”, in *Reuters*, 1 February 2023, <https://www.reuters.com/technology/us-official-acknowledges-japan-netherlands-deal-curb-chipmaking-exports-china-2023-02-01>.

⁴⁷ Netherlands House of Representatives, *Wapenexportbeleid, Brief van de Minister voor Buitenlandse Handel en Ontwikkelingssamenwerking* [Arms export policy, Letter from the Minister for Foreign Trade and Development Cooperation], 8 March 2023, <https://www.tweedekamer.nl/downloads/document?id=2023D09406>.

⁴⁸ European Commission, *EU-US Launch Trade and Technology Council to Lead Values-based Global Digital Transformation*, 15 June 2021, https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2990.

(ECHI).⁴⁹ At the time, there were reports that EU-wide cooperation with the Summit for Democracy had been blocked by Hungary which had not been invited to participate.⁵⁰ The ECHI led to the adoption in March 2023 of a voluntary “Code of Conduct” signed by 25 states – twelve EU member states and thirteen non-EU member states.⁵¹

4.5 US re-export controls

The extraterritorial application of US export controls has often been a source of tension between the US and EU member states, particularly when the US has used these controls to block sales by European manufacturers that it deems contrary to its security interests. These cases have led some European companies to minimise the presence of US-made components in military and security equipment that they produce.⁵² US re-export controls have been discussed in the context of the TTC.⁵³ In July 2023 the US and EU held a joint online event under the auspices of the TTC on “transatlantic trade facilitation in relation to dual-use item, in particular their re-export and relevant license requirement and exceptions”.⁵⁴ The event built on a stakeholder consultation process and involved participation from governments, industry and academia. However, this is also an area where substantive cooperation continues to take place at the US-EU member state level. In 2022 France and the United States launched the “Defense Trade Strategic Dialogue”, a bilateral agreement aimed at “smoothing out defense market access and export controls, addressing the U.S. International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), and French export regulations”.⁵⁵

⁴⁹ Australia et al., *Joint Statement on the Export Controls and Human Rights Initiative*, 10 December 2021, <https://www.whitehouse.gov/briefing-room/statements-releases/2021/12/10/joint-statement-on-the-export-controls-and-human-rights-initiative>.

⁵⁰ Vlad Makszimov, “Hungary: US Has Bigger Problems with Democracy, Blocks EU Position at Summit”, in *Euractiv*, 3 December 2021, <https://www.euractiv.com/?p=1683311>.

⁵¹ US Department of State, *Export Controls and Human Rights Initiative Code of Conduct Released at the Summit for Democracy*, 30 March 2023, <https://www.state.gov/export-controls-and-human-rights-initiative-code-of-conduct-released-at-the-summit-for-democracy>. The states that have endorsed the Code are Albania, Australia, Bulgaria, Canada, Costa Rica, Croatia, Czechia, Denmark, Ecuador, Estonia, Finland, France, Germany, Japan, Kosovo, Latvia, The Netherlands, New Zealand, North Macedonia, Norway, Republic of Korea, Slovakia, Spain, the United States and the United Kingdom.

⁵² US Embassy in Paris, *Airbus: Fears of Defense Trade Controls Hurt U.S. Exports* (Cable to US Secretary of State, 08PARIS1078_a), 5 June 2008, <http://wikileaks.org/cable/2008/06/08PARIS1078.html>.

⁵³ Trade and Technology Council, *Joint Statement EU-US Trade and Technology Council of 31 May 2023*, cit.

⁵⁴ European Commission DG Trade, *4th Joint EU-US Stakeholders Outreach Event Re-Export of Dual-use Items*, 19 July 2023, https://policy.trade.ec.europa.eu/node/1453_en.

⁵⁵ Pierre Tran, “French Arms Exports Set Record €27 Billion in 2022”, in *Defense Aerospace*, 4 December 2023, <https://www.defense-aerospace.com/french-arms-exports-set-record-e27-billion-in-2022>.

Conclusions

Dual-use export controls look set to become an ever more prominent aspect of both the US and the EU's security and economic policies, making alignment and cooperation increasingly important. When it was launched in 2021, the TTC looked set to be the primary forum for the US and EU to coordinate on a range of export control issues. However, either due to the number of other issues that the TTC has sought to address or the complexities of EU-US coordination on export controls, some of the export control topics that were on the agenda of early TTC meetings have not featured at subsequent meetings.⁵⁶ There are also concerns about the future of the TTC after the November 2024 elections if President Trump returns to the White House or there are significant changes in the national security council under a second Biden administration.⁵⁷ Substantive coordination on export controls is taking place but it is occurring across multiple forums and through exchanges that involve different EU agencies and various departments of the US government as well as bilateral exchanges between the United States and individual EU member states.

The complexity of EU-US coordination on export controls is a product of the way in which responsibility for export controls is spread across multiple agencies within both the United States and EU. It is also a reflection of how responsibility for export controls in the EU – along with economic, defence and foreign policy issues more broadly – is located at both the community and member state level. However, it is also a reflection of the Biden administration's embrace of what has been termed "minilateral cooperation", understood as "informal, non-binding, purpose-built partnerships and coalitions of the interested, willing, and capable".⁵⁸

Minilateral cooperation has enabled the United States to advance its goals along multiple fronts and allowed discussions to progress on control list additions and enforcement measures at a faster pace than would have been possible in existing multilateral bodies such as the WA. However, the overlaps in the membership and focus of these different groupings creates challenges, particular for smaller states with less capacity to track and manage coordination processes across multiple forums. A deeper concern with minilateralism, noted in 2015 when the US embrace of this approach was still in its infancy, is that it threatens "to replace the provision of international public goods with club goods benefiting a narrower range of countries" which could discredit or side-line established multilateral arrangements like the regimes.⁵⁹

⁵⁶ European Commission, *EU and US Take Stock of Trade and Technology Cooperation*, 30 January 2024, https://ec.europa.eu/commission/presscorner/detail/en/IP_24_575.

⁵⁷ Alexandra Brzozowski et al., "EU Officials Scramble to Prove Trade and Technology Council Will Survive Trump", in *Euractiv*, 4 April 2024, <https://www.euractiv.com/?p=2071454>.

⁵⁸ Stewart Patrick, "New 'New Multilateralism': Minilateral Cooperation, but at What Cost?", in *Global Summitry*, Vol. 1, No. 2 (Winter 2015), p. 115-134 at p. 115, <https://doi.org/10.1093/global/guv008>.

⁵⁹ *Ibid.*, p. 117.

Greater alignment in the content and implementation of member states' export controls would presumably make US-EU coordination easier to achieve, since the positions taken by the EU in those conversations would reflect the views and positions of all member states. The new "forum" for political coordination on export controls which the Commission proposed in its January white paper is intended to help address the lack of alignment in key areas of member states' systems.⁶⁰ While member states clearly wish to maintain sovereignty in this policy area they have also indicated that they see the value of greater coordination.⁶¹ A new forum, if properly configured, could enable an alignment of positions on more sensitive issues by elevating discussions to a more senior political level.⁶² Balancing these different perceptions and objectives will be key to improving strategic coordination between the EU and the United States on export controls in the future.

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⁶⁰ European Commission, *White Paper on Export Controls*, cit., p. 10-11.

⁶¹ See Netherlands, *Kabinetsappreciatie witboek over exportcontrole*, cit.

⁶² See Mark Bromley, Lucie Béraud-Sudreau and Giovanna Maletta, "A New Political Forum Could Help Make the EU's Strategic Trade Controls More Strategic – If It Is Allowed to", in *SIPRI Commentaries*, 10 April 2024, <https://www.sipri.org/node/6844>.

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