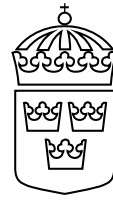


# Regeringens skrivelse

## 2024/25:114



### Strategic Export Controls in 2024 – Military Equipment and Dual-Use Items

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Skr.  
2024/25:114

The Government submits this Communication to the Riksdag.

Stockholm den 3 April 2025

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## Main content of the Communication

In this Communication, the Swedish Government provides an account of Sweden's export control policy with respect to military equipment and dual-use items in 2024. The Communication also contains a report detailing exports of military equipment during the year. In addition, it describes the cooperation in the European Union (EU) and other international forums on matters relating to strategic export controls on both military equipment and dual-use items.

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# 1 Government Communication on Strategic Export Controls

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In this Communication the Government provides an account of the policy regarding strategic export controls in 2024, i.e. the export controls on military equipment and dual-use items. The term dual-use items is used in reference to items produced for civil use that may also be used in the production of weapons of mass destruction or military equipment.

Control of exports of military equipment is necessary in order to meet Sweden's national objectives and international obligations, and to ensure that the exporting of items from Sweden is done in accordance with the established export control rules. Under Section 1, second paragraph of the Military Equipment Act (1992:1300), military equipment may only be exported if there are security or defence policy reasons for doing so, and provided there is no conflict with Sweden's international obligations or Swedish foreign policy. Applications for licences are considered in accordance with the Swedish guidelines on exports of military equipment, the criteria in the EU's Council Common Position (2008/944/CFSP) defining common rules governing control of exports of military technology and equipment, and the Arms Trade Treaty (ATT). The Inspectorate of Strategic Products (ISP) is the competent licensing authority.

The multilateral agreements and instruments relating to disarmament and non-proliferation of weapons of mass destruction are important manifestations of the international community's efforts to prevent the proliferation of such weapons. The proliferation of weapons of mass destruction can be counteracted by controlling the trade in dual-use items. Export controls enable individual governments to meet their international obligations with respect to non-proliferation. Export controls of dual-use items are also necessary to reduce the undesirable and destabilising development of conventional military capabilities. By ensuring that dual-use items are not exported to unfit recipients according to Sweden, our country's security is strengthened. Thus, it is necessary for Sweden to have strict and effective national export controls of dual-use items from the point of view of non-proliferation as well as Sweden's security.

This is the forty-first time that the Government has reported on strategic export controls policy in a Communication to the Riksdag. The first Communication on strategic export controls was presented in 1985. Sweden was then one of the first countries in Europe to report on activities in the area in the preceding year.

Since that time, the Communication has been developed from a brief compilation of Swedish exports of military equipment to a comprehensive account of Sweden's export control policy in its entirety. More statistics are available today thanks to an increasingly transparent policy and more effective information processing systems. In parallel with Sweden's policy of disclosure, EU Member States have gradually developed, since 2000, a shared policy of detailed disclosure.

As part of efforts to increase transparency, this year's Communication includes detailed information on military equipment supplied by Swedish companies abroad. As in recent years, this year's statistics include a special list of donations of military equipment to Ukraine from the Swedish state.

The ISP and the Swedish Radiation Safety Authority (SSM) contribute statistical data for the Communication at the request of the Government. The statistics in this Communication supplement the information available in these authorities' own publications. In Annex 3 the ISP presents its own view on significant trends in Swedish and international export control.

## Significant events during the year

In 2024, a major impact on strategic export controls continues to be the deteriorating international security situation. Russia's war of aggression against Ukraine since 2014 and the full-scale invasion of the country on 24 February 2022 constitute a flagrant violation of international law and the European security order. The war Russia is waging against Ukraine had a very marked effect on Swedish foreign and security policy during 2024 as well, and has had considerable consequences in the area of export control.

In response to Russia's full-scale invasion of Ukraine on 24 February 2022, the EU imposed sweeping and unprecedented sanctions on Russia in 2022, with additional packages of sanctions in 2023 and 2024. The packages of sanctions in 2022, 2023 and 2024 included dual-use items, advanced technology and civilian firearms. During the year, the sanctions have been tightened during the year under the 13th, 14th and 15th sanctions packages. Concerning military equipment, sanctions against Russia were introduced by the EU as early as 2014 when Russia began its illegal aggression against Ukraine.

To support Ukraine, Sweden has sent multiple support packages, including military equipment. Not since the Winter War in Finland has Sweden provided military equipment to a country involved in armed conflict to the extent that we are now supporting Ukraine.

Sweden became a member of the North Atlantic Treaty Organization (NATO) on 7 March 2024. NATO membership changes the conditions governing exports of military equipment within Sweden's national regulations.

The 2023 Military Equipment Inquiry was tasked with reviewing the guidelines in light of Sweden's membership of NATO, as well as the conditions for international materiel cooperation and the regulation of subcontractors. The Inquiry submitted its report *Ett modernt och anpassat regelverk för krigsmateriel* (A modern, adapted regulatory framework for military equipment) to the Minister for Foreign Affairs in December. The report was referred for consultation at the end of the year.

In 2024, meetings in the multilateral export control regimes continued at the same pace as in 2023 and before the pandemic.

During the year, the accelerating pace of development in emerging technologies such as artificial intelligence, quantum computing and

biotechnology have made work with export controls all the more urgent, nationally as well as in the multilateral export control regimes. Skr. 2024/25:114

Besides being the licensing authority in export control cases and the review authority for direct investments, the ISP is also the competent authority in relation to the sanctions, including the comprehensive packages of sanctions on Russia adopted by the EU.

## Summary of the statistical data

Comprehensive statistics on licence approval and on Swedish exports of military equipment and dual-use items are presented in two annexes to this Communication. The statistics cover data from 1 January to 31 December 2024.

Exports and other activity related to military equipment in 2024 are presented in Annex 1. Exports are also shown over the course of time, as individual licences and deliveries of major systems may cause wide fluctuations in the annual statistics.

In 2024, 450 companies, government authorities and private individuals held licences for manufacturing or supplying military equipment. Since 2018, the number of license holders has more than doubled. The increase relates principally to subcontractors of system manufacturers of military equipment.

A total of 59 countries received deliveries of military equipment from Sweden. The value of military equipment exports in 2024 was just over SEK 29 billion. The value of exports thus increased by around 63% compared to the previous year.

More than 70% of exports went to the 39 countries which, according to the Government, are established partner countries in the defence and security area. The share is somewhat lower than the previous year, mainly due to the delivery of two airborne radar systems, worth over SEK 6 billion, to United Arab Emirates (UAE) during the year. These deliveries made the United Arab Emirates the most significant recipient country, followed by the United States and Brazil. Exports to the United States included a large number of different types of equipment, including naval artillery systems and tracked vehicles. Deliveries to Brazil continued to consist mainly of the Jas Gripen fighter aircraft system.

In the case of Ukraine, a total of 52 export licences were granted for donations from the Swedish state in 2024, while 30 licences were issued for sales from the Swedish defence industry. In addition, over the past year ISP has granted further transfers of military equipment manufactured in Sweden from other countries. Most of the donated and transferred military equipment has involved ground combat and rocket systems.

Exports of airborne radar systems to the United Arab emirates accounted for just over 95% of total exports to the Middle East. In other respects also, exports consisted largely of follow-on deliveries to previously supplied equipment.

Exports to Israel during the year consisted of follow-on deliveries to private companies comprising components which, at the time of the original delivery, were not counted as military equipment. Deliveries in 2024 were made under export licences issued in previous years. No export licence has been issued for the sale of military equipment since October 2023. Sweden has not granted a licence for the sale of military equipment to the Israeli Armed Forces or other state actors in Israel since the 1950s.

The licensing of dual-use items is presented in Annex 2. Unlike in cases of exports of military equipment, the companies involved do not submit any delivery declarations. There is consequently a lack of data on actual exports. As a rule, transfer of dual-use items within the EU does not require

a licence. In addition, extensive EU general licences make exports to certain partner countries outside the EU possible without requiring a licence in the individual case. This means that recipient countries that are the object of most dual-use item exports are not included in the statistics.

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## 2 Military equipment

### 2.1 Background and regulations

A licence requirement for exports of military equipment is necessary to ensure that the export of items from Sweden and the provision of technical assistance is done in accordance with established export control rules. Under military equipment legislation, export controls cover the manufacture, supply and export of military equipment, as well as agreements on cooperation or manufacturing rights, etc., regarding such equipment.

The regulatory framework for Swedish export controls consists of the Military Equipment Act (1992:1300) and the Military Equipment Ordinance (1992:1303), as well as the principles and guidelines on exports of military equipment decided upon by the Government and approved by the Riksdag. Under Section 1, second paragraph of the Military Equipment Act (1992:1300), military equipment may only be exported if there are security or defence policy reasons for doing so, and provided there is no conflict with Sweden's international obligations or Swedish foreign policy. Sweden's international obligations also must be taken into account in the examination of applications for licences. This includes the EU Common Position 2008/944/CFSP defining common rules governing control of exports of military technology and equipment, as well as the criteria set forth in the Arms Trade Treaty (ATT).

Swedish examination of licence applications is based on an overall assessment in accordance with government guidelines and established practice. The international rules are more in the nature of individual criteria to be observed, assessed or complied with. As an independent authority, the ISP is tasked with assessing licence applications independently in accordance with the whole regulatory framework.

Under the Military Equipment Act, export controls thus cover the manufacture, supply and export of military equipment, as well as certain agreements on cooperation and rights to manufacture such equipment. The Act applies both to equipment that is designed for military use and that constitutes military equipment under government regulations and to such technical support for military equipment that, according to the government regulations, constitutes technical assistance. The list of what constitutes military equipment and technical assistance is contained in the annex to the Military Equipment Ordinance. The Swedish list of military equipment is in line with the EU's Common Military List, with the exception of three national supplements: nuclear explosive devices and special parts for such devices, fortification facilities etc. and certain chemical agents.

In 2018, a stricter Swedish regulatory framework for exports of military equipment was introduced with the broad support of the Riksdag (Govt Bill 2017/18:23). This tightening of the rules included introducing the democratic status of the recipient country, and its respect for human rights, key conditions in the examination of licence applications. This is unique to Sweden's regulatory framework.

Swedish export control rules are updated as required. The opportunities for successfully addressing the challenges that are a feature of non-proliferation efforts are improved in that way. For example, in 2021 the Government decided to introduce systematic post-shipment controls (verification visits) abroad for exports of light weapons from Sweden. Such controls can be a valuable complement to strict assessments of licence application in countering the diversion of military equipment to non-intended recipients, i.e. the exported equipment ends up with a different end-user than the intended end-user. The system was introduced on 1 March 2022.

Post-shipment controls involve visits from personnel from the exporting countries in a country to which certain military equipment has been exported in order to confirm that the equipment is still with the end-user. The aim is thereby also to reinforce mutual trust. Post-shipment controls have previously mainly been carried out by the United States, but have also been introduced in recent years by other countries, including Switzerland, Spain and Germany.

Sweden's post-shipment controls concern light weapons for which the risk of diversion is deemed to be most substantial. In practice, these are in total five types of anti-tank systems and short-range man-portable air-defence systems (MANPADS).

The ISP is responsible for carrying out post-shipment control visits in the recipient countries. In practice, the visits mean that the ISP on site in the recipient country counts the quantity of the system exported. Established partner countries, for which there are no foreign policy obstacles to foreign cooperation, are exempted from the requirement for post-shipment controls. The system of post-shipment controls will be evaluated within three years of carrying out the first control visit.

## **Export controls and sustainable development**

Human rights, democracy and the rule of law are priority areas in Swedish foreign policy, and also important aspects of Sweden's work to implement the 2030 Agenda. Sweden is to implement the 2030 Agenda through a unified policy, nationally and internationally. According to the Swedish guidelines, the assessment of licence applications for the export of military equipment must also take into account whether the export or foreign cooperation runs counter to equitable and sustainable development in the recipient country in accordance with the 2030 Agenda. The Government strives to avoid Swedish exports of military equipment that negatively affect progress toward equitable and sustainable global development.

As mentioned above in this section, a unique aspect of the Swedish guidelines is that the democratic status of the recipient country is a key condition in the examination of licence applications. The weaker the



democratic status the less scope there is for granting a licence. If serious and extensive violations of human rights or grave deficiencies in the recipient's democratic status occur, this poses an obstacle to granting licences. Assessment of applications for licences must also take account of whether the export impedes sustainable development in the recipient country. The effects on sustainable development are also being taken into consideration through the application of the EU Common Position on arms exports, the eighth criterion of which highlights the technical and economic capacity of recipient countries and the need to consider whether a potential export risks seriously hampering sustainable development.

There is a clear expectation from the Government that Swedish companies will act sustainably and responsibly and base their work on the international guidelines for corporate social responsibility, both in Sweden and abroad. A number of measures have been taken to encourage and support companies in their sustainability work. These include the introduction of legislation on sustainability reporting for large companies, clearer criteria for sustainability in the Public Procurement Act (2016:1145) and stronger legal protection for whistle-blowers. In addition to what is governed by Swedish legislation, the Government expects Swedish companies to apply a clear anti-corruption policy and contribute to greater transparency.

The largest Swedish industry association in the defence area, the Swedish Security and Defence Industry Association (SOFF), organises more than 95% of the defence companies in Sweden. In connection with companies signing membership agreements, SOFF requires that companies comply with SOFF's ethics policy. Individuals who represent the companies also undergo special e-training on anti-corruption that has been developed jointly by SOFF and the Swedish Defence Materiel Administration. To date, roughly 5 800 individuals have undergone this training. SOFF also arranges annual experience swapping sessions between senior managers on high business ethics standards.

## **Export controls and gender equality**

The Government attaches great importance to work with gender equality in development cooperation as well as in foreign and security policy. Preventing and countering all forms of gender-based and sexual violence in conflicts and within societies generally is a high priority, as is highlighting and strengthening women's influence and meaningful participation in political processes and peace- and state-building at all levels of society. These are key objectives in Sweden's National Action Plan for the implementation of UN Security Council Resolution 1325 on Women, Peace and Security (2024-2028). An important part of this work is the strict control of exports of military equipment from Sweden. Article 7(4) of the Arms Trade Treaty states that the States Parties must take into account the risk of exported equipment being used to commit or facilitate serious acts of gender-based violence or serious acts of violence against children and women. The Government is actively working to ensure that Article 7(4) is applied in practice by the States Parties to the Treaty, and for these issues to continue to be highlighted and followed up

in work on the Treaty. Sweden was one of the countries that drove the introduction of the term ‘gender-based violence’ (GBV) into the Arms Trade Treaty, which was the first time the term had been used in an international, legally binding instrument.

It should be noted that consideration of Article 7(4) of the Treaty takes place in addition to the assessment made previously with respect to human rights under the Swedish guidelines, and according to Criterion Two of the EU Common Position (2008/944/CFSP) on exports of military equipment. The latter regulatory frameworks are therefore also significant in this context.

At national level, the ISP is responsible for ensuring that gender equality aspects and risks of gender-based and sexual violence are taken into account when assessing licence applications and when applying Article 7(4) of the Arms Trade Treaty.

## 2.2 The role of defence exports from a security policy perspective

The foundations of today’s Swedish defence industries were laid during the Cold War. The ambition at the time was that Sweden would be independent of foreign suppliers. The defence industry thus became an important part of Swedish security policy. Exports of military equipment, which during this time were limited, were an element in ensuring capacity to develop and produce equipment adapted to the needs of the Swedish armed forces.

After the end of the Cold War, this striving for independence in terms of access to military equipment for the Swedish armed forces has gradually been replaced by a growing need for equipment cooperation with like-minded states and neighbours. Technical and economic development has meant that both Sweden and its partner countries are mutually dependent on deliveries of components, sub-systems and finished systems manufactured in other countries. These deliveries in many cases are ensured through contractual obligations. A significant part of the Swedish defence industry is now owned by parent companies in third countries, primarily the United States and the United Kingdom. For Sweden, it is therefore important from the security policy perspective to ensure openness to cooperation concerning the defence industry with third countries. This is relevant, for example, in the context of EU cooperation.

Sweden is pursuing a solidarity-based alliance policy aimed at strengthening security and stability in our neighbourhood, and in the entire Euro-Atlantic region. Sweden will continue to build our national security with others, as a member in solidarity of NATO and the EU.

Swedish security policy should be pre-emptive in the first instance, and prevent the emergence of threats against Sweden. This requires active, broad and responsible international action. As far as possible, challenges and threats to our security will be addressed in cooperation with other countries and organisations. Sweden is best defended within NATO. Sweden’s NATO membership increases security for Sweden as well as NATO as a whole.

Sweden's security increases when it contributes to a safer world, a stable neighbourhood and predictable intergovernmental relations. Sweden's foreign and security policy is based on cohesion in the EU and in NATO, as well as cooperation in the Nordic and Baltic Sea regions, within the UN and the Organisation for Security and Cooperation in Europe (OSCE). Sweden's cooperation with allies such as our Nordic and Baltic neighbours, the United States and the United Kingdom, is of particular importance for Sweden's security. The transatlantic link is crucial for Sweden's and Europe's security.

On 24 February 2022, Russia launched an unprovoked, unjustifiable, full-scale invasion of Ukraine in violation of international law. The attack on Ukraine is also a breach of the European security order. Russia's actions have resulted in a drastic deterioration in the security situation that is structural and long range. This has extensive and far-reaching consequences for Sweden.

The capacity for practical military collaboration (interoperability) is dependent on Sweden's military equipment systems being able to function together with the equipment of partner countries, as well as being technically mature, reliable and available. It is therefore in Sweden's security policy interests to safeguard long-term and continuous cooperation on equipment issues with a number of traditional partner countries. This mutual cooperation is based, among other things, on both exports and imports of military equipment.

In previous Government bills, the Government has highlighted the military aircraft sector, the underwater sector, cartridge ammunition and integrity-critical aspects of the command and control sector, such as sensors, electronic warfare and crypto, as key security interests for Sweden.

The opportunity to maintain national integrity and independence within areas of particular significance is important. Sweden's defence industry and exports of military equipment are an essential part of our security policy. There are therefore defence or security policy reasons for every export deal, ultimately linked to Swedish defence capability.

Currently, the most important military item areas for Swedish defence and security companies where there are security and defence policy reasons in support of exports of military equipment are:

- 1 combat aircraft,
- 2 surface vessels and submarines,
- 3 combat vehicles and tracked vehicles,
- 4 short and long-range weapons systems in the form of land and sea-based and airborne systems, including missiles,
- 5 small and large-bore ammunition,
- 6 smart artillery ammunition,
- 7 land and sea-based and airborne radar and IR systems,
- 8 electronic warfare systems that are passive and active,
- 9 telecommunications systems, including electronic countermeasures,
- 10 command and control systems for land, sea and air applications,
- 11 systems for exercises and training,
- 12 signature adaptation (e.g. camouflage systems and radar),
- 13 systems for civil protection,

- 14 encryption equipment,
- 15 torpedoes,
- 16 maintenance of aircraft engines,
- 17 gunpowder and other pyrotechnic materials,
- 18 services and consultancy,
- 19 support systems for operation and maintenance.

## **Equipment support to Ukraine**

As a consequence of Russia's violation of international law with its full-scale invasion of Ukraine, the Government decided already on 28 February 2022 to donate military equipment to Ukraine in order to support the country's right to self-defence and its territory. In 2024, three additional support packages were provided. A total of 18 military support packages have been provided since 2022. The support packages include weapons, ammunition, air defence systems, off-road passenger vehicles, assault craft and protective equipment, but also financial contributions. See Annex 1 for more information.

In addition, a number of decisions have been made on the provision of large-scale humanitarian aid efforts, civilian crisis management support, reform support and construction support to Ukraine. The total military, civilian and humanitarian aid amounts to approximately SEK 74.7 billion since 2022.

## **Sweden's NATO membership and consequences for Swedish export controls of military equipment**

On 7 March 2024, Sweden joined NATO as a full member. As a NATO member, Sweden contributes in solidarity to the security of NATO as a whole. Membership of NATO includes a commitment to the Organization's nuclear doctrine and strategic deterrence. Sweden is covered by NATO's operations planning and capability development, and contributes to NATO's deterrence and defence measures. Sweden is subject to the consultation obligation and mutual defence guarantees in accordance with Articles 4 and 5 of the North Atlantic Treaty. In addition, Sweden has obligations under Article 3 to develop the individual and collective capacity to resist armed attack, which has a bearing on exports of military equipment.

The Government has made it clear that NATO membership changes the conditions governing exports of military equipment within Sweden's national regulations. Sweden's membership of NATO greatly strengthens the defence and security policy reasons for granting licences for the export of military equipment to NATO member countries. In November 2023, the Government appointed the 2023 Military Equipment Inquiry to review Sweden's regulations in light of a Swedish NATO membership and a changed security policy situation. The Inquiry was chaired by former Speaker Per Westerberg. The Inquiry submitted its report *Ett modernt och anpassat regelverk för krigsmateriel* (A modern, adapted regulatory framework for military equipment) to the Minister for Foreign Affairs on 2 December 2024. The report's proposals include updated guidelines, a

new regulation for military equipment subcontractors and how the manufacture and export of civilian firearms can be handled. In addition, the Inquiry proposes that Sweden should accede to the 2019 export control agreement concluded between France, Germany and Spain. The report was referred for consultation in December 2024.

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## 2.3 Cooperation within the EU on export controls on military equipment

### **The EU Common Position on Arms Exports**

The EU Member States have national rules concerning the export of military equipment. However, the Member States have also chosen to coordinate their export control policies to some extent. The EU Code of Conduct on Arms Exports, adopted in 1998, contained common criteria for exports of military equipment, applied in conjunction with national assessments of export applications. The Code of Conduct was made stricter in 2005, and was adopted as a Common Position in 2008 (2008/944/CFSP). It is applied by all the EU Member States and a number of countries that are not members of the EU (Albania, Bosnia and Herzegovina, Canada, Georgia, Iceland, Montenegro, North Macedonia and Norway).

The Common Position contains among other things eight criteria that are to be considered before taking a decision to approve exports of military equipment to a given country:

- *Criterion One* stipulates that the international obligations and commitments of Member States must be respected, in particular the sanctions adopted by the UN Security Council or the European Union.
- *Criterion Two* is concerned with respect for human rights in the country of final destination as well as respect by that country of international humanitarian law. Export licences are to be denied if there is a clear risk that the military technology or equipment to be exported might be used for internal repression.
- *Criterion Three* is concerned with the internal situation in the country of final destination, as a function of the existence of tensions or armed conflicts.
- *Criterion Four* is aimed at preservation of regional peace, security and stability. Export licences may not be issued if there is a clear risk that the intended recipient would use the military technology or equipment to be exported aggressively against another country or to assert by force a territorial claim.
- *Criterion Five* is concerned with the potential effect of the military technology or equipment to be exported on the country's defence and security interests as well as those of another Member State or those of friendly and allied countries.
- *Criterion Six* is concerned with the behaviour of the purchasing country with regard to the international community, as regards for example its attitude to terrorism and respect for international law.

- *Criterion Seven* is concerned with the existence of a risk that the military technology or equipment will be diverted within the purchasing country or re-exported under undesirable conditions.
- *Criterion Eight* stipulates that the Member States must take into account whether the proposed export would seriously hamper the sustainable development of the recipient country.

Individual Member States may operate more restrictive policies than are stipulated in the Common Position. The Common Position also includes a list of the items covered by the controls (the EU Common Military List). A user's guide has also been produced that provides more details about the implementation of the agreements in the Common Position on the exchange of information and consultations, and about how these criteria for export control are to be applied. The User's Guide is continually updated.

## **Work as part of COARM**

The Working Party on Conventional Arms Exports (COARM) is a forum in which EU Member States regularly discuss the application of the Common Position on Arms Exports. Member States also exchange views on various export destinations. An account of this work, the agreements reached and statistics on the Member States' exports of military equipment is published in an annual EU report.

Since the criteria in the Common Position span a number of different policy areas, the goal is to achieve an increased and clear coherence between these areas. Sweden is making active efforts to reach a common view among the Member States on implementation of the Common Position. An important way of bringing this about is to increase transparency between the Member States. In 2024, the work in COARM focused on a review of the Common Position, which is carried out every five years. The work was not completed during the year.

Through COARM, the EU pursues an active policy of dialogue with third countries on export controls. In this context, dialogue meetings were held during 2024 with Norway and the United States, among others.

Another aspect of the work targeting third countries is the aid programmes that the EU has for those countries that choose to accede to the Arms Trade Treaty. The aid programmes aim to improve export controls in the area of military equipment and to promote the implementation of the Treaty.

## **Exchange of information on denials**

In accordance with the rules for implementing the Common Position, Member States must exchange details of export licence applications that have been denied. Sweden received 117 denial notifications from other Member States and Norway in 2024.

Sweden submitted two denial notifications. The denials concerned Thailand and Türkiye. The fact that exports to a particular recipient country have been denied in a specific case does not mean that the country

is not eligible for Swedish exports of military equipment in other cases. Swedish export controls do not use a system involving lists of countries, i.e. pre-determined lists of countries that are either approved or not approved as recipients. Each individual export application is considered in an overall assessment based on the guidelines adopted by the Government for exports of military equipment, the EU Common Position and the Arms Trade Treaty. To allow a licence to be granted, the application must be supported by the regulatory framework as a whole. Skr. 2024/25:114

If a Member State is considering granting a licence for an essentially identical transaction that another state has denied, consultations are to take place before a licence can be granted. The former Member State also has to inform the latter state of its decision. The exchange of denial notifications and consultations on the notifications make export policy in the EU more transparent and uniform in the longer term between the Member States. The consultations also lead to greater consensus on different export destinations. Member States notifying each other about the export deals that are denied, and explaining the grounds for such denials, reduces the risk of another Member State approving the export. The ISP is responsible for notifications of Swedish denials and arranges consultations. Sweden received one consultation enquiry from another EU Member State in 2024. One consultations was initiated by Sweden during the year.

### **Work on EU Directive 2009/43/EC on transfers of defence-related products within the EU and the EEA**

Under the Swedish Presidency in 2009, Directive 2009/43/EC of the European Parliament and of the Council of 6 May 2009 simplifying terms and conditions of transfers of defence-related products within the Community, the ICT Directive, was adopted. The intention with the Directive was to allow for more competitive groups of defence industry companies and defence cooperation at the European level. The European Commission is in charge of the implementation of the Directive. It is assisted in this work by an expert group of representatives from the Members States. The Expert Group held two meetings during 2024.

The main focus of the Expert Group's work during the year continued to be identifying the export control challenges that Member States and participating entities may face as a result of projects financed via the European Defence Fund (EDF), and how the ICT Directive can be used to facilitate the implementation of the EDF projects. In the European Defence Industry Strategy (EDIS), the Commission has announced its intention to evaluate the ICT Directive, which is to be completed by the end of 2025. The purpose of the evaluation is to analyse the challenges for a correct and effective implementation of the Directive. During the year, the Commission has communicated and discussed the evaluation with the Expert Group and announced that the Expert Group will be used as a point of contact for consultation with the Member States.

## **Exports of civilian firearms**

Regulation (EU) No 258/2012 of the European Parliament and of the Council implementing Article 10 of the Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition, supplementing the UN Convention against Transnational Organized Crime (UN Firearms Protocol), and establishing export authorisation, and import and transit measures for firearms, their parts and components and ammunition was adopted in 2012. The intention of the regulation, and of the UN protocol, is to combat crime by reducing access to firearms. References to exports in the Regulation indicate exports outside of the EU; from the point of view of Sweden, this means, on the one hand, exports from Sweden to third countries and, on the other, exports from any other Member State to a third country in cases where the supplier is established in Sweden.

The Regulation covers firearms, parts for weapons and ammunition for civil use. It does not apply to firearms etc. that are specially designed for military use, or to fully automatic weapons. Exceptions to the scope of the Regulation are bilateral transactions, firearms etc. that are destined for the armed forces, the police or the authorities of the Member States. Replica weapons, deactivated firearms rendered unusable, antique firearms and collectors or other institutions concerned with the cultural and historical aspects of firearms also fall outside of the scope of the Regulation.

Those firearms etc. that are encompassed by the EU Regulation are also covered, with the exception of smooth-bored hunting and sporting weapons, by the appendix to the Military Equipment Ordinance. According to the EU Firearms Regulation, those aspects that are encompassed by the Common Position must be taken into consideration when assessing licence applications.

The EU Regulation has been applied in Sweden since 2013. There are provisions that complement the EU Regulation in the Ordinance (2013:707) concerning the control of certain firearms, parts of firearms and ammunition. The ISP is the authority responsible for licences in accordance with the EU Regulation. In 2024, 234 cases were received by the ISP and 228 export licences were granted.

## **Arms embargoes**

Within the scope of its Common Foreign and Security Policy (CFSP), the EU implements embargoes that have been adopted by the UN on, for example, the trade in arms and dual-use items. The EU can also decide unanimously on certain embargoes extending beyond those adopted by the UN Security Council. These decisions by the Council of the EU may be regarded as an expression of the Member States' desire to act collectively on various security policy issues. An arms embargo that has been adopted by the UN or the EU is implemented in accordance with each Member State's national export control regulations. EU arms embargoes normally also include prohibitions on the provision of technical and financial services relating to military equipment. These prohibitions are governed by Council Regulations and are therefore directly applicable within the EU



Member States. Embargoes on trade in dual-use items are governed by both Council Decisions and Council Regulations. These are normally also accompanied by prohibition of the provision of technical and financial services relating to these items.

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A decision by the UN Security Council, the EU or the OSCE to impose an arms embargo represents an unconditional obstacle to Swedish exports in accordance with the Swedish guidelines for exports of military equipment. If an arms embargo also applies to imports, special regulations on the prohibition are issued in Sweden. Such regulations have previously been issued for Iran, Libya and North Korea. As a result of the EU sanctions against Russia, the Government decided in 2014 to impose such an arms embargo on Russia. In 2024, the embargo covering dual-use items and additional items connected to dual-use items has been expanded in stages. There are currently formal EU decisions, either independent or based on UN decisions, to impose arms embargoes on Afghanistan, Belarus, the Central African Republic, the Democratic Republic of Congo, Iran, Iraq, Lebanon, Libya, Myanmar, North Korea, Russia, Somalia, South Sudan, Sudan, Syria, Venezuela, Yemen and Zimbabwe. These embargoes vary in their focus and scope. There are also individually targeted arms embargoes against individuals and entities currently named on the UN terrorist list. The EU also applies an arms embargo against China, based on a Council declaration issued as a result of the events in Tiananmen Square in 1989. This embargo is not rooted in any legal instrument. Its application varies between the Member States according to national legislation, rules and decision-making processes. Sweden does not permit the export of any military equipment to China. Under an OSCE decision, a weapons embargo is also maintained on the area of Nagorno-Karabakh, which for Sweden affects both Armenia and Azerbaijan.

The Ministry for Foreign Affairs has collated information on what restrictive measures (sanctions) against other countries exist in the EU and thus apply to Sweden. Information can be found on the website [www.regeringen.se/sanktioner](http://www.regeringen.se/sanktioner) and is updated regularly. This website provides a country-by-country account of arms embargoes and embargoes on dual-use items that are in force. It also contains links to websites with EU legal acts covering sanctions and, where applicable, the UN decisions that have preceded the EU measures.

## 2.4 Other international cooperation on export control of military equipment

### **Transparency in conventional arms trade**

The UN General Assembly adopted a resolution on transparency in the arms trade in 1991. The resolution urges the UN member states to voluntarily submit annual reports on their imports and exports of conventional weapon systems to a register administered by the United Nations Office for Disarmament Affairs (UNODA).

The reports are concerned with trade in the following seven categories of equipment: tanks, armoured combat vehicles, heavy artillery, combat aircraft, attack helicopters, warships and missiles or missile launchers. The definitions of the different categories have been successively expanded to include more weapons systems, and it is now also possible to voluntarily report trade in small arms and light weapons. Particular importance is now attached to Man-Portable Air Defence Systems, which are included in the category of missiles and missile launchers. The voluntary reporting also includes information on countries' stockpiles of these weapons and procurements from their own defence industries. In consultation with the Ministry of Defence and the ISP, the Ministry for Foreign Affairs compiles annual data, which is submitted to the UN in accordance with the resolution.

As the Register is based on reports from many major exporters and importers, a significant share of world trade in heavy conventional weapon systems is reflected here.

Sweden's share of world trade in heavy weapon systems continues to be limited. The report for 2024 that Sweden will submit to the UN on the seven categories of equipment lists exports of combat aircraft to Brazil and Hungary; combat vehicles to the Netherlands and Switzerland; anti-tank systems to France, India, Latvia, South Africa and the United States; rocket-propelled grenades to Australia, Finland, France, India, Japan, Malaysia, Poland and the United States; and portable air defence systems to Latvia. There are no exports from Sweden to report for other categories. Trade in heavy weapons systems and small arms and light weapons is reported annually to the OSCE in the same way as to the UN.

The reporting mechanism of the Wassenaar Arrangement export regime regarding exports of military equipment largely follows the seven categories reported to the UN Register. However, certain categories have been refined through the introduction of subgroups and an eighth category for small arms and light weapons has been added. The Member States have agreed to report twice yearly, in accordance with an agreed procedure, and further information may then be submitted voluntarily. The purpose of this agreement is to draw attention to destabilising accumulations of weapons at an early stage. Exports of certain dual-use items and technology are also reported twice yearly.

## **The Arms Trade Treaty**

In 2013, the UN General Assembly voted to approve the international Arms Trade Treaty (ATT). The Treaty created an internationally binding instrument that requires its State Parties to maintain effective national control of the international trade in defence equipment and sets standards for what this control will entail. The anticipated long-term effects of this treaty are:

- countries that regularly produce and export military equipment taking greater responsibility,
- a reduction in unregulated international trade, as more states accede and introduce controls, and

- better opportunities to counteract the illegal trade, through the increased number of countries that exercise control and through improved cooperation between them.
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The Arms Trade Treaty entered into force in 2014. All the EU Member States have ratified the Treaty and are therefore full States Parties to it. At the end of 2024, 116 states had ratified the Treaty and a further 26 had signed it.

In 2024, the tenth Conference of States Parties was held. Three working groups have been set up for Treaty work between the Conferences. They discuss the effectiveness of the implementation of the Treaty, increased accession to the Treaty and transparency and reporting issues. In addition, a Voluntary Trust Fund has been established for financial support to projects for States Parties that need help with improving their control systems. A forum has also been established for information exchanges, to enable States Parties and signatory states to exchange information on detected or suspected diversions in arms trafficking.

The Government attaches great importance to the widespread accession to and effective implementation of the Arms Trade Treaty. This is a universal, legally binding treaty that strengthens the control of trade in conventional arms is an effective tool to deal with the cross-border flows of weapons that nurture armed violence and armed conflicts. Sweden therefore plays an active part in continued work aimed at realising the objectives of the Treaty and the accession of more states. During the year, Sweden has reported exports of conventional weapons to the ATT Secretariat.

In 2024, Sweden participated in the working groups' meetings and in the State Parties meeting. Sweden has previously contributed to the ATT's Voluntary Trust Fund as well as to the UN Trust Facility Supporting Cooperation on Arms Regulation (UNSCAR). The two funds complement each other in that they are focused on different support channels. In 2024, Sweden also provided grants to civil society organisations working to strengthen the implementation of and broader accession to the ATT, such as the Parliamentary Forum on Small Arms and Light Weapons (PFSALW).

During the year, EU Member States continued to coordinate their actions concerning the ATT in the Council working group COARM.

## **Small arms and light weapons (SALW)**

The term 'small arms and light weapons' (SALW) essentially refers to firearms which are intended to be carried and used by one person, as well as weapons intended to be carried and used by two or more persons. Examples of the former category include pistols and assault rifles. Examples of the latter include machine guns, rocket-propelled grenades and portable missiles. Work to prevent and combat the destabilising accumulation and the uncontrolled proliferation of small arms and light weapons is currently taking place in various international forums such as the UN, the EU and the OSCE. No other type of weapons causes more deaths and suffering than these, which are used every day in local and

regional conflicts, particularly in developing countries and in connection with serious and often organised crime.

Sweden strives to ensure that all countries establish and implement a responsible export policy with comprehensive laws and regulations. The aim is for all countries to have effective systems that control manufacturers, sellers, buyers, agents and brokers of SALW.

In 2001, the UN adopted a programme of action to prevent, combat and eradicate the illicit trade in small arms and light weapons (SALW). The UN's work aims to raise awareness of the destabilising effect small arms and light weapons have on regions suffering from conflict. Non-proliferation is also important in combating criminality and, in particular, terrorism. The UN's programme of action complements the international arms trade control work of the Arms Trade Treaty by focusing on measures at national level to reduce illegal flows of small arms and light weapons. In 2024, Sweden participated in the fourth Review Conference within the Programme of Action. At the Review Conference, among other things the State Parties decided to set up a new technical working group to address issues related to illegal SALW manufacturing including new technologies (3D printing, etc.).

Work within the EU is based on a common strategy adopted in 2018 against illegal firearms and small arms and light weapons and ammunition. The strategy contains a number of proposals for measures for work on small arms and light weapons within the Union's borders and in the vicinity of the EU and reflects Swedish priorities well.

During the year, Sweden reported exports of small arms and light weapons to the UN arms trade register as well as to the OSCE Register of Conventional Arms.

During 2024, Sweden also contributed to several activities and funds that aim to reduce the uncontrolled proliferation of small arms and light weapons, and to strengthen the international processes in this area. One example is the Voluntary Trust Fund in support of the implementation of the regional roadmap on combating illicit small arms and light weapons trafficking in the Western Balkans, which was established by the United Nations Development Programme (UNDP). Sweden is one of the largest donors to the Fund. Another example is Sweden's support to the Small Arms Survey (SAS) organisation.

## **The Six Nation Initiative**

In 2000, the six nations in Europe with the largest defence industries – France, Germany, Italy, Spain, Sweden and the United Kingdom – signed an important defence industry cooperation agreement at governmental level. This agreement was negotiated as a result of the declaration of intent adopted by the countries' defence ministers in 1998, the Six Nation Initiative. The purpose of the agreement is to facilitate rationalisation, restructuring and the operation of the European defence industry. Activity in the Six Nation Initiative and its working groups also covers export control issues.

In 2024, the ISP hosted the annual meeting at director level of the informal working group LoI Export Control Informal Working Group (LoI

ECIWG). During the year, the informal working group focused sharing experiences concerning export control as well as ongoing work with export control-related matters within the framework of the European Defence Fund.

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## 3 Dual-Use Items

### 3.1 Background and definitions

The term dual-use items is used in reference to items produced for civil use that may also be used in the production of weapons of mass destruction or military equipment. Dual-use items may also include certain other items of particular strategic importance, such as encryption systems.

The need to control exports of dual-use items is justified by the fact that, for example, some countries run programmes to develop weapons of mass destruction despite having signed international agreements prohibiting or regulating such activities, or because they remain outside these agreements. Such countries have often increased their capacity by importing civilian items that have then been used for military purposes. Export control of dual-use items is also required to reduce the undesirable and destabilising development of conventional military capabilities.

The inclusion of a dual-use item on a control list does not mean that the export of that item is prohibited, only that the item is deemed to be sensitive and its export is therefore subject to control. The export control measures required in the EU must be well-demarcated in consideration of the risk of proliferation and not unnecessarily disrupt the internal market or the competitiveness of European companies.

Much of the work in the EU and in the international export control regimes consists in an extensive exchange of information, directed at domestic industry and at other countries, on the need for export control and the development of export control systems.

It is difficult to provide an overall picture of the industries that work with dual-use items in Sweden, since a considerable proportion of items are sold in the EU's internal market or exported to markets covered by the EU's general export licences (see section 3.2 below).

### 3.2 Regulation of Dual-Use Items

In order to prevent the proliferation of weapons of mass destruction and thus to contribute to international security, exports of dual-use items are subject to special regulation at the international level.

Sweden has both legally binding commitments that have been adopted by the UN and the EU, and political commitments, within the scope of the export control regimes, aimed at limiting the spread of sensitive items and technology, including those that can be used to manufacture weapons of mass destruction.

Export control itself is always exercised at national level, but extensive coordination also takes place through international export control regimes (see section 3.5 for a review of the regimes) and within the EU. In Sweden's case, export controls of dual-use items are governed primarily by 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 (the Dual-Use Regulation) and Sweden's Dual-Use Items and Technical Assistance Control Act (2000:1064) – the Dual Use Act. The export of dual-use items is further limited in many cases by targeted restrictive measures (sanctions) which are described in more detail in section 3.3.

## **The Dual-Use Regulation**

For the EU Member States, there is a common regulatory framework in the form of the Dual-Use Regulation. The Dual-Use Regulation is directly applicable in all EU Member States.

## **Annex I to the Dual-Use Regulation**

In the EU, the control lists continuously updated in the international export control regimes (see section 3.5 on the export control regimes) are transferred to Annex I of the Dual-Use Regulation. Annex I to the Regulation then constitutes the list of items and technologies that require a licence when exported from the EU. The EU's control list thus constitutes a compilation of the control lists of the international export control regimes. Through this, the EU contributes to codifying the control of military equipment and dual-use items in accordance with international norms that apply in the most important producer countries in the world. Countries outside the EU and the export control regimes have also chosen to include the EU's Annex I in their export control legislation as it is comprehensive and clear.

## **Other control options**

Article 4(1) of the Dual-Use Regulation establishes that Member States may utilise a mechanism which means that items not included in Annex I of the Dual-Use Regulation can be made subject to controls (the catch-all clause). The mechanism can be utilised if the exporter has been informed by the Swedish authorities that the item in question is or may be intended, in its entirety or in part for use in the production etc. of weapons of mass destruction. The mechanism can also be applied in other instances, for example where the items are intended for military end-use if the country purchasing the items or the country of destination is covered by a legally binding arms embargo.

For the mechanism to be applicable, the exporter must have been informed of the item's area of use by the Swedish authorities. However, if the exporter is aware that an item is intended, in its entirety or in part, for

uses referred to in Article 4(1), they are required to report this to the Swedish authorities. The competent authority must then determine whether a licence is required for the export.

Article 4(3) provides that Member State may adopt or maintain national legislation imposing an authorisation requirement on the export of dual-use items not listed in Annex I if the exporter has grounds for suspecting that those items are or may be intended, in their entirety or in part, for any of the uses referred to in Article 4(1). Sweden has utilised this mechanism, and has introduced a requirement for exporters to inform the competent authority if the exporter has reason to suspect that a dual-use item not listed in Annex I to the Dual-Use Regulation and which it intends to export is, or may be, intended for one of the uses referred to in Article 4(1) of that Regulation.

This is known as the catch-all mechanism, and is also common practice within the international export control regimes. By enabling broader controls than just those dual-use items that are listed in the Annex, the mechanism is important for the effectiveness of export controls.

Article 5 of the Dual-Use Regulation also makes exports of unlisted cyber-surveillance items subject to an obligation to obtain a licence if the exporter has been informed by the competent authority that the items may be intended for use in connection with internal repression or to commit serious violations of human rights or international humanitarian law. Cyber-surveillance items are defined in Article 2(20) of the Dual-Use Regulation as items that are specifically designed to enable the covert surveillance of natural persons by monitoring, extracting, collecting or analysing data from information and telecommunication systems.

According to Article 9 in the Dual-Use Regulation, a Member State may prohibit or impose an authorisation requirement on the export of dual-use items not listed in Annex I for reasons of public security, including the prevention of acts of terrorism, or for human rights considerations. To date, Sweden has not utilised this option to expand its national controls.

An additional control option is provided for in Article 10 whereby a Member State may impose an authorisation requirement for the export of dual-use items not listed in Annex I for the export of those items on the basis of a national control list of items adopted by another Member State pursuant to Article 9, and if the exporter has been informed by the competent authority that the item in question may be intended for uses of concern with respect to public security, including the prevention of acts of terrorism, or to human rights considerations. The purpose of the mechanism in Article 10 is to enable Member States to coordinate their actions quickly when new risks are identified, for example due to emerging technologies.

## General licences

The principal rule in the EU is that no licence is required for transfer to another EU Member State. The EU general licence EU001 covers exports of all items listed in Annex I to the Dual-Use Regulation, with certain exceptions, to Australia, Canada, Iceland, Japan, Norway, New Zealand, Switzerland including Liechtenstein, the United States and the United

## **Swedish legislation**

In Sweden, export control of dual-use items and of technical assistance in connection with these items is regulated in the Dual-Use Act. This Act contains provisions supplementing the EU's Dual-Use Regulation. Following from the recasting of the Dual-Use Regulation in 2021, a number of amendments were made to the Act, which included the introduction of powers for the Government to issue regulations governing licence requirements.

Unlike exporters which are subject to the military equipment legislation, no basic operating licences under the export control legislation are required for exporters that produce or otherwise trade in dual-use items. Nor are these exporters obliged to make a declaration of delivery in accordance with the export control legislation. However, a company is obliged to make a fee declaration if it has supplied controlled items subject to supervision by the ISP. This includes sales within and outside Sweden.

An exporting company is under an obligation to notify the ISP if the company is aware, or has reason to suspect, that a dual-use item which the company in question intends to export, and which is not listed in Annex I to the Dual-Use Regulation, is intended for use in connection with weapons of mass destruction; for a military end-use in a country covered by a weapons embargo; or may be used as a component for military equipment that has been exported from the EU without a licence. Failure to comply with this obligation is a criminal offence. After notification, the ISP is required to examine and decide whether a licence should be required in the individual case. The same applies if the exporter has reason to suspect that a cyber-surveillance item not listed in Annex I to the EU Regulation is intended for use in connection with internal repression and/or the commission of serious violations of human rights and international humanitarian law under Article 5 of the same Regulation.

### **3.3      Restrictive measures (sanctions) in the dual-use items area**

#### **The relationship between sanctions and export controls**

There are fundamental differences between restrictive measures (sanctions) and export controls in the dual-use items area. Sanctions can be imposed on a government, a group, an organisation or individuals by a legally binding decision of the EU, the UN or an individual state. The primary intention is that the person targeted by the sanctions should change their behaviour, for example, cease internal repression or flagrant violations of international law. The sanctions cover various types of restrictive measures and often include prohibitions on exports and imports of dual-use items and military equipment, but not necessarily. The reason



that sanctions very often target these strategic items is because they are often used in the acts that violate international law or human rights. The sanctions are thus a foreign policy tool to, for example, put pressure on an authoritarian leader to carry out democratic reforms, induce a state to cease military aggression against a neighbouring country, or restore respect for human rights.

Unlike sanctions, the control of exports of dual-use items is based mainly on the security policy interests of the exporting country in relation to the intended recipient or end-user. How significant the export is to national security is a major factor in this assessment. In the regulations governing export controls of both military equipment and dual-use items, there are opportunities to take into account the risks of violations of international humanitarian law and human rights in the licence application process. There is a connection between a lack of respect for human rights and the incidence of armed conflicts, which shows that widespread violations of human rights have a security policy dimension. Unlike export controls of dual-use items, sanctions are decided within the framework of the EU Common Foreign and Security Policy and through decisions of the UN Security Council.

## **Country-specific sanctions**

All EU nuclear technology-related sanctions against Iran were lifted in 2016 in accordance with the Joint Comprehensive Plan of Action (JCPoA), as the International Atomic Energy Agency (IAEA) had confirmed that Iran had complied with its obligations under the plan. In spring 2018 the United States announced that it intended to leave the JCPoA and unilaterally re-introduce the sanctions previously lifted as a result of the agreement. The United States' sanctions were subsequently reinstated in several stages in 2018 and have since been expanded. The EU's obligations under the plan remain in place for the time being. Licensing procedures now apply to dual-use items that have previously been subject to embargoes. However, this does not apply to items covered by the Missile Technology Control Regime (MTCR), which continue to be covered by prohibitions.

The export of dual-use items to North Korea is subject to an embargo imposed by the UN Security Council. The embargo has been implemented and extended by the EU and covers all items on the EU's control list. Certain similar items are also covered by an embargo.

In accordance with EU decisions, exports of certain dual-use items are also prohibited or covered by a licence requirement in relation to Syria.

In light of Belarus's support for Russia's full-scale invasion of Ukraine, the EU has expanded the restrictive measures against Belarus related to the export of dual-use items. In 2024, the EU expanded the sanctions against the country in response to the regime's continued support for Russia's aggression and to prevent sanction circumventions.

### 3.4 Enhanced sanctions related to dual-use items against Russia in 2024

The EU's restrictive measures (sanctions) against Russia are of such a comprehensive nature and importance that they deserve their own separate section. The sanctions that were decided already in 2014 as a result of Russia's illegal annexation of Crimea and Russia's aggression towards Ukraine have been greatly expanded in connection with Russia's continued aggression.

Since 2022, selling or exporting dual-use items to Russia or for use in Russia, directly or indirectly, has been prohibited. The provision of technical or financial assistance, brokering services or other services related to such exports are also covered by prohibitions. The prohibition applies to all items listed in Annex I to the Dual-Use Regulation.

Throughout the year, the EU has continuously expanded and tightened the sanctions in the EU's 13th, 14th and 15th packages of sanctions. The 15th package was adopted on 16 December and includes additional restrictive measures in view of Russia's continued aggression that is destabilising the situation in Ukraine. The 15th package expands the list of entities subject to tighter export restrictions. The expansion included entities located in third countries (China, India, Iran, Serbia and the United Arab Emirates) that have been involved in the circumvention of trade restrictions or engaged in the procurement of sensitive items used in Russia's war against Ukraine, such as drones or missiles.

There is a limited possibility of exemptions from the prohibition when it comes to exports for non-military use and for a non-military end-user, and where intended for humanitarian and medical purposes, maritime safety, etc.

### 3.5 Cooperation within international export regimes

To strengthen international cooperation for the non-proliferation of weapons of mass destruction, some forty countries have joined together on their own initiative in five international export control regimes: The Australia Group, the Missile Technology Control Regime, the Nuclear Suppliers Group, the Wassenaar Arrangement and the Zangger Committee.

The purpose of the regimes is to identify goods and technologies that can be used in connection with weapons of mass destruction and to prevent destabilising accumulations of conventional weapons and to enhance the uniformity of the participating countries' export control of these. To support this work, each regime has a list of items subject to control. The lists are revised annually. This work also includes exchanging information on refused exports, proliferation risks and contacts with third countries for the purpose of promoting the regimes' non-proliferation objectives.

Cooperation in the multilateral export control regimes is grounded in a shared political will to prevent the proliferation of weapons of mass destruction. This is achieved through national legislation enabling the

export control of goods and technologies identified as strategic. Cooperation in the regimes is not legally binding but are in fact political commitments. However, the control lists from the regimes are incorporated by the EU into the Dual-Use Regulation and thus become legally binding. Participation in these regimes also makes it easier to meet the legally binding international law obligations in the above-mentioned international agreements to refrain from assisting other states, directly or indirectly, in acquiring weapons of mass destruction.

The international export control regimes have worked for many years on early identification of new non-controlled items and technologies that can be used for military purposes. Ever-faster development in emerging technologies, for example artificial intelligence (AI), advanced semiconductors, quantum computers and biotechnology, makes this work increasingly crucial. Sweden is affected by this development, as it has export-oriented and advanced industry with leading-edge technology. Ever-greater attention needs to be paid to emerging sensitive technologies, both nationally, for example through strengthened collaboration between government agencies, and internationally through cooperation with other countries in the various export control regimes.

## **The Australia Group**

The Australia Group was formed in 1985 on the initiative of Australia. Its aim is to harmonise member states' export controls to prevent the proliferation of chemical and biological weapons. Originally, the Group's work only encompassed chemicals and chemical production equipment. In 1990, however, it was decided to expand the control lists to include microorganisms, toxins and certain manufacturing equipment for biological weapons. The Australia Group supports non-proliferation commitments under the Biological and Toxin Weapons Convention (BTWC) and the Chemical Weapons Convention (CWC). All EU Member States participate in this regime. Russia does not participate in this regime. The control lists for this regime were updated in 2024 at the 35th Australia Group Plenary in Paris.

## **The Missile Technology Control Regime**

The Missile Technology Control Regime (MTCR) was set up as a result of an American initiative in 1982. It focuses on export controls of complete rocket systems (including ballistic missiles, space launch vehicles and sounding rockets) and other unmanned aerial vehicles (including cruise missiles, drones and reconnaissance platforms) with a range of 300 kilometres or more. Controls also extend to components of such systems and other items that can be used to produce robots, as well as smaller unmanned aerial vehicles designed to be able to spread aerosols. Today, the MTCR has 35 members, including India and Russia. Nine EU Member States stand outside this regime. The regime's control lists are updated annually at plenary meetings. The plenary meeting host becomes the Chair of the MTCR for the period extending to the next plenary meeting. However, a plenary meeting was not held in 2024.

## **Nuclear Suppliers Group**

The Nuclear Suppliers Group's (NSG) is concerned with the export control of items for nuclear-related use (Part 1 of the NSG Guidelines) and other dual-use items that can be used in connection with the development or production of nuclear weapons (Part 2 of the NSG Guidelines). The items listed by NSG are listed in the IAEA's Information Circular No. 254, which includes two control lists for each group of items (INFCIRC/254/Rev.14/Part 1 and INFCIRC/254/Rev.11/Part 2). Today, the NSG has 48 Participating Governments (PG), including all EU Member States, China and Russia. The regime's control lists are updated annually at plenary meetings. The plenary meeting host is the outgoing Chair. The 2024 plenary meeting took place in Rio de Janeiro under Brazil's Chairship. South Africa was elected as the new Chair for the period 2024–2025.

## **The Wassenaar Arrangement**

The Wassenaar Arrangement was formed in 1996 as a successor to the international export control cooperation that had previously taken place within the Coordinating Committee for Multilateral Export Controls (CoCom). The Arrangement's work covers the control of conventional weapons, as well as dual-use items and technologies not controlled by other regimes. Consequently, it represents an important complement to the work of other regimes that focus exclusively on weapons of mass destruction and certain delivery systems. The Arrangement currently has 42 participating states. These include most large producers and technology holders in the areas concerned.

The Arrangement's aim is to contribute to regional and international security and stability by promoting openness and responsible action with regard to transfers of conventional weapons and dual-use items, thus helping to avoid destabilising accumulations. The basic view taken by the Wassenaar Arrangement is that trading of the items in the control lists should be permitted, but must be controlled.

An important function maintained by the Wassenaar Arrangement is to bring together technical expertise from the participating states on a regular basis to update the common control lists in light of technical developments.

The Arrangement maintains two control lists that are attached to its basic documents: the Munitions List, which covers conventional military equipment, and the List of Dual-Use Goods and Technologies, which covers goods and technologies with both civilian and military uses that are not included in the other regimes' control lists. In practice, the two lists guide the contents of the EU's corresponding control lists.

The Wassenaar Arrangement's annual plenary meetings are held in Vienna in the late autumn. These meetings address matters of fundamental significance to the continued development of this cooperation. On the basis of the ongoing technical work throughout the year, formal decisions are also made on updating the control lists. During the 2024 plenary meeting, further listing proposals were approved.

The Zangger Committee was established in 1974 and deals with export control issues related to the Treaty on the Non-Proliferation of Nuclear Weapons (Non-Proliferation Treaty, or NPT). The Committee establishes what is meant in Article III(2) of the Treaty by ‘especially designed or prepared equipment or material for the processing, use or production of special fissionable material’. Consequently, its responsibilities overlap to some extent with those of the NSG, which was dealt with above. The informal nature of the regime however has enabled it to act as a forum for certain non-proliferation issues which could have been more difficult to resolve in the NSG. The Swedish Defence Research Agency (FOI) is responsible for maintaining the Zangger Committee’s website. The Zangger Committee has 39 Member States and meets annually in Vienna. The annual meeting was held on 26 November 2024.

### 3.6 Collaboration within the EU on dual-use items

#### **The export control regimes and the EU**

Work within the EU on the export control of dual-use items is closely associated with the international work that takes place as part of the export control regimes. Coordination within the EU takes place principally within the Council’s Working Party on Non-Proliferation and Disarmament (CONOP), which deals with non-proliferation issues in general, and within the Working Party on Dual-Use Goods (WPDU), which works, among other things, on policy issues and updating the control list of dual-use items which fall under the Dual-Use Regulation.

In accordance with the EU’s strategy against the proliferation of weapons of mass destruction, the Member States have to work towards the EU being a leading partner in the export control regimes. The EU has long held the view that all EU Member States should be invited to join all of the export control regimes. The main reason is the EU’s Single Market, which covers the vast majority of dual-use items, as well as the endeavour to maintain effective national export controls that are harmonised for all EU Member States, based on the regimes’ control lists, guidelines for export controls and exchanges of information on proliferation risks. Trade within the EU is not counted as exports in this context. EU Member States are thus dependent on each country’s export control systems. This is an additional reason why the issue of membership in the export control regimes is a substantial one.

All EU Member States are members of the NSG and the Australia Group. This is not the case for the Missile Technology Control Regime, where decisions have not yet been made on Croatia, Cyprus, Estonia, Latvia, Lithuania, Malta, Romania, Slovakia and Slovenia. The same applies to Cyprus with regard to the Wassenaar Arrangement.

The changes made to the regimes’ control lists over the course of the year are detailed in Annex I of the Dual-Use Regulation, and thus become legally binding for EU Member States. In accordance with its delegated authorities, the Commission has updated Annex I with the changes

Skr. 2024/25:114 determined within the export control regimes, and has made consequential amendments to Annexes IIa–IIg and Annex IV. The changes are set out in the regimes towards the end of a calendar year and are usually entered in Annex I in the subsequent year.

## **The Working Party on Dual-Use**

In 2024, the activities of the Working Party on Dual-Use Goods (WPDU) were shaped by the White Paper on Dual-Use Export Controls presented by the Commission on 24 January 2024. The White Paper was published as part of the Commission’s Joint Communication on “European Economic Security Strategy” of 20 June 2023, which stated that the Commission would propose measures aimed at fully implementing the Dual-Use Regulation and make a proposal to ensure its effectiveness and efficiency.

The White Paper included four proposed responses that guided most of the WPDU’s work in 2024. In the short term, it was proposed to expand the EU’s export control list to include items that were not adopted by the multilateral export control regimes due to blockage by certain members. The White Paper also advocated the establishment of a forum for political coordination and announced that the Commission will present a to adopt a Recommendation proposing to enhance such coordination of Member States’ national export control measures. The White Paper also proposed bringing forward the timing of the evaluation of the Dual-Use Regulation.

On 30 May 2024, the Council approved conclusions concerning the White Paper. The Council called for more cooperation and coordination of export controls in the EU, while clarifying that the existing distribution of competencies and the multinational approach to export controls in Multilateral Export

Control Regimes must be safeguarded. The WPDU continued to discuss the individual proposed responses during the presidencies of Belgium and Hungary.

In addition to the discussions on the proposed responses in the Commission’s White Paper, the WPDU has continued its work on the implementation of the Dual-Use Regulation. On 11 October 2024, the Commission and the Council published guidelines on the export of cyber-surveillance items under Article 5 of the Dual-Use Regulation.

## **Dual-Use Coordination Group**

The Working Party on Dual-Use Goods (WPDU) has an underlying Dual-Use Coordination Group (DUCG). Work in the DUCG aims to coordinate the application of the Dual-Use Regulation. Sweden is represented in the group by the ISP and the SSM. During the year, the group worked on the coordination of Member States’ national control lists, supported the updating of the EU Common Control List, produced statistical data for the Commission’s annual report on export control, and shared experiences and information on national implementations of the dual-use items regulatory framework.

### 3.7 UN Security Council Resolution 1540 and the Proliferation Security Initiative

Skr. 2024/25:114

The United Nations Security Council adopted Resolution 1540 in 2004. The Resolution, supported by Chapter VII of the UN Charter, through binding decisions, obliges all UN Member States to prevent non-state actors (terrorists) from gaining access to weapons of mass destruction, their means of delivery and items connected to such weapons. It sets out, among other things, that all states are to establish effective national controls on exports, brokering, transit and trans-shipments. The Resolution also contains provisions on assisting other countries with the implementation of the obligatory measures.

It was also decided through Resolution 1540 to establish a committee tasked with reporting to the Security Council on the Resolution's implementation. The UN's Member States are urged to report to this committee on the steps that they have taken to implement the Resolution. In November 2022, the mandate for the 1540 Committee was extended until November 2032.

An international initiative that shares several points with Security Council Resolution 1540 and partly overlaps with it is the Proliferation Security Initiative, to which over 100 countries have acceded. This initiative, supported by the EU and Sweden, aims to strengthen international cooperation in order to be better able to prevent the transport of weapons of mass destruction and the components of such items to unauthorised recipients within the framework of international and national law. National efforts to maintain the necessary preparedness and to act in an urgent matter of this type are divided between the authorities concerned according to established remit principles. Russia ended its participation in the cooperation at the end of 2022 and claims to be not bound by the initiative's obligations.

## 4 Responsible authorities

### 4.1 The Inspectorate of Strategic Products

The Inspectorate of Strategic Products (ISP) is the central administrative authority for cases and supervision pursuant to the Military Equipment Act (1992:1300) and the Dual-Use Items and Technical Assistance Control Act (2000:1064). For dual-use items and technical assistance, the ISP has this responsibility in cases where no other authority has this remit. The Swedish Radiation Safety Authority has the same responsibility with reference to particularly sensitive nuclear technology products.

The Swedish Defence Research Agency and the Swedish National Defence Radio Establishment assist the ISP by providing technical expertise and organisations including the Swedish Military Intelligence and Security Directorate, the Swedish Security Service and the Swedish National Defence Radio Establishment supply the ISP with information. The ISP also has an established partnership with Swedish Customs. Some

of the ISP's compliance visits are carried out jointly with Swedish Customs and the authorities also exchange information on export licences.

The Government has appointed the ISP as the competent authority with responsibility for executing certain duties stipulated by Council resolutions concerning sanctions that have been decided on by the EU. In 2024, this work continued to expand in scope and importance due to the greatly strengthened sanctions imposed on Russia. The ISP also has supervisory duties in relation to special prohibiting regulations issued by the Government with the support of the Act (1996:95) on Certain International Sanctions.

The ISP is the national authority under the 1992 Chemical Weapons Convention (CWC) and performs the duties pursuant to the Act (1994:118) concerning inspections under the United Nations Chemical Weapons Convention. This aspect of the ISP's activities is not dealt with in the present Communication, as it does not have a direct link to the Inspectorate's work relating to export control.

The ISP is also the licensing authority in accordance with Regulation (EU) No 258/2012 of the European Parliament and of the Council of 14 March 2012 implementing Article 10 of the United Nations' Protocol against the illicit manufacturing of and trafficking in firearms, their parts and components and ammunition, supplementing the United Nations Convention against Transnational Organised Crime (UN Firearms Protocol), and establishing export authorisation, and import and transit measures for firearms, their parts and components and ammunition (EU Firearms Regulation). The Regulation regulates licences to export civilian firearms, their parts and ammunition outside the EU, as well as certain import and transit measures.

The ISP's tasks relating to the screening of foreign direct investments is not dealt with in the present Communication, as it does not currently have a direct link to the Inspectorate's work relating to export control.

The authority's responsibilities are set out in the Ordinance (2010:1101) with instructions for the Inspectorate of Strategic Products. The Ordinance stipulates that the ISP shall present to the Government each year 1) a report on Swedish exports of military equipment and other strategic products during the previous calendar year and 2) a description of significant trends in Swedish and international export control. This information forms the basis for the annual communication on strategic export controls, including this year's communication.

## **Contacts with companies**

The ISP maintains regular contact with the companies whose exports are subject to control. The Military Equipment Act and the Military Equipment Ordinance set forth most of the obligations for companies to present notifications and data to the ISP. For example, companies have to report regularly to the ISP on their marketing activities abroad. These reports form the basis for the ISP's periodic briefings with the companies regarding their export plans. The ISP may issue positive or negative advance rulings to the companies on destinations that are sensitive or have not yet been assessed.



In addition to processing export licence applications, the ISP reviews the notifications that companies and authorities are obliged to submit at least four weeks prior to submitting tenders or signing contracts concerning exports of military equipment or other cooperation with foreign partners in this field. At this stage, the ISP has the opportunity to notify prohibitions on submitting tenders or entering into contracts. Exporters of military equipment must also report the deliveries of military equipment that are made under the export licences issued to them.

In contrast to military equipment, no operating licence is required to manufacture or supply dual-use items under export control legislation. Furthermore, as a general rule, a licence is not required for the sale and transfer of dual-use items within the EU. However, a licence for such transfers does apply to certain products listed in Annex IV of the Dual-Use Regulation. In light of this, the ISP's contacts with companies that deal with dual-use items are different to those that apply to military equipment. The control list that is drawn up in accordance with the Dual-Use Regulation states which categories of items require licences to be exported outside the EU. It is primarily up to the companies to classify whether or not an item should be seen as a dual-use item. When a company is unsure whether its item belongs to the controlled items category, the company can submit a request for an advance ruling to the ISP.

In its supervisory role, the ISP carries out compliance visits to companies and authorities to monitor their internal export control organisations. During 2024, ISP carried out 36 compliance visits to companies operating in the fields of dual-use items and military equipment areas. In addition, 18 compliance activities were carried out in the form of off-site supervision. These included companies operating in the fields of both dual-use items and military equipment.

## Funding

Rules concerning the ISP's funding are detailed in the Ordinance (2008:889) on the financing of the operations of the Inspectorate of Strategic Products (ISP). A large part of the ISP's activities are financed through fees from its control activities. The Ordinance stipulates that the fee structure is broken down into three categories: military equipment, dual-use items and items covered by the Act Concerning Inspections in Accordance with the UN Convention on the Prohibition of Chemical Weapons (1994:118).

When the Ordinance (2013:707) concerning the control of certain firearms, parts of firearms and ammunition handed the ISP the task of assessing export licence applications in accordance with the EU Firearms Regulation, the ISP was also given the right to charge licence application fees.

Parts of the ISP's international operations, support to the Government Offices of Sweden and work on international sanctions, are funded by appropriations.

The ISP's exports of services should primarily be funded by parties other than the ISP. No services were exported in 2024.

## Export Control Council

The Riksdag decided in 1984, on the basis of the Government Bill proposing greater transparency and consultation on matters relating to exports of military equipment etc. (Govt Bill 1984/85:82), that an advisory board on military equipment issues should be established. The Government reorganised this board into the Export Control Council (ECC) in connection with the establishment of the ISP in 1996. The rules governing the composition and activities of the ECC are included in the ISP's instructions. All parliamentary parties are represented on the ECC, in some cases with a former Member of the Riksdag. It is chaired by the Director-General of the ISP.

A new Export Control Council started work on 10 March 2023, after being appointed by the Government. A list of the Council's members and deputy members appears at the end of this section.

The Director-General of the ISP is responsible for selecting the cases subject to consultation with the Export Control Council. Consultation can take place, for example, before an advance ruling is issued to a company. The Director-General has to consult the Council before the ISP submits an application to the Government for final assessment under the Military Equipment Act or the Dual-Use Items and Technical Assistance Control Act.

At meetings of the ECC, the Ministry for Foreign Affairs presents assessments of the relevant recipient countries. The Ministry of Defence provides assessments of the defence policy aspects of the cases. The ISP's Director-General may also summon other experts. One task of the ECC is to present opinions on proposed exports based on the Swedish guidelines, the EU Common Position on arms exports and the Arms Trade Treaty in order to provide further guidance to the ISP.

The members have unrestricted access to the documentation of all export licence application proceedings. The Director-General reports continuously on all export licence decisions, processed tender notifications and cooperation agreements, as well as advance rulings that have been ruled upon. With effect from 2005, the ISP also reports all export licence decisions and advance rulings on dual-use items to the ECC. Taken together, this system ensures good insight into the application of the rules on export control for the members of all parties represented in the Riksdag.

The Swedish system is comparatively unique internationally in that representatives of the parties represented in the Riksdag have the opportunity to discuss potential export deals in advance. The intention is to build a broad consensus on export control policy and promote continuity in the policy pursued. Unlike in many other countries, the Export Control Council deals with cases at an early stage, before a specific deal is carried out. Since it would harm the exporting companies commercially if their plans were made known before they had concluded a deal, the Export Control Council's discussions are not made public. The assessments of individual countries are normally subject to confidentiality in relation to foreign affairs.

The Advisory Council on Foreign Affairs, and not the Export Control Council, is still consulted in cases where this is prescribed by the Instrument of Government. In 2024, five meetings of the ECC were held.

The ECC dealt with six matters for consultation. All of these concerned military equipment. Skr. 2024/25:114

In 2024, the members of the Export Control Council were:

- Member of the Riksdag Johan Andersson (Social Democrats)
- Emma Berginger, Member of the Riksdag (Green Party)
- Camilla Brunsberg, Member of the Riksdag (Moderate Party)
- Torsten Elofsson, Member of the Riksdag (Christian Democrats)
- Yasmine Eriksson, Member of the Riksdag (Sweden Democrats)
- Kenneth G. Forslund, Member of the Riksdag (Social Democrats)
- Marie Granlund, former Member of the Riksdag (Social Democrats)
- Hanna Gunnarsson, Member of the Riksdag (Left Party)
- Kerstin Lundgren, Member of Riksdag (Centre Party)
- Lars Püss, Member of the Riksdag (Moderate Party)
- Björn Söder, Member of the Riksdag (Sweden Democrats)
- Anna Starbrink, Member of the Riksdag (Liberal Party)

Deputy members of the Export Control Council:

- Gudrun Brunegård, Member of the Riksdag (Christian Democrats)
- Joar Forssell, Member of the Riksdag (Liberal Party)
- Rasmus Giertz, Member of the Riksdag (Sweden Democrats)
- Ann-Charlotte Hammar Johnsson, Member of the Riksdag (Moderate Party)
- Mikael Larsson, Member of the Riksdag (Centre Party)
- Jacob Risberg, Member of the Riksdag (Green Party)
- Håkan Svenneling, Member of the Riksdag (Left Party)
- Alexandra Völker, Member of the Riksdag (Social Democrats)

## **The Strategic Cooperation Council**

The Strategic Cooperation Council is a cooperative council attached to the ISP for cooperation on issues related to non-proliferation. It consists of the Director-General and the respective heads of the Swedish Security Service, the Swedish Armed Forces through the Swedish Military Intelligence and Security Directorate, the National Defence Radio Establishment, Swedish Customs, and the Swedish Defence Research Institute. The Strategic Cooperation Council met once in 2024.

## **Technical-Scientific Council**

A Technical-Scientific Council is attached to the ISP to assist the Director-General of the ISP in the discussion of matters concerning the classification of military equipment and dual-use items. The Council consists of representatives of institutions with expertise in the technology's civilian and military applications. The Technical-Scientific Council held one meeting in 2024.

## 4.2 Swedish Radiation Safety Authority

In accordance with the Ordinance (2008:452) with instructions for the Swedish Radiation Safety Authority, the Swedish Radiation Safety Authority (SSM) is the central government authority for issues relating to the protection of human health and the environment against the harmful effects of ionising and non-ionising radiation, security and physical protection in nuclear and other activities involving radiation and nuclear non-proliferation.

The SSM's non-proliferation remit in connection with exports of nuclear material and nuclear technology products is stated in the Ordinance mentioned and in the Dual-Use Items and Technical Assistance Control Ordinance (2000:1217). The Ordinance states that the SSM decides on licences for exports to a non-EU country and for intra-EU transfers of nuclear materials and other materials, etc., that are listed in Annex I to the Dual-Use Regulation and which belong to Category 0. This does not, however, apply in certain specific cases, stated in the Ordinance, for which the Government is the decision-making body. The SSM is also the national supervisory authority which checks that these provisions are followed.

By Government Decision, the SSM is assigned as the authority regarding consideration of applications which follow from Council Regulation (EU) No 267/2012 of 23 March 2012 concerning restrictive measures against Iran and repealing Regulation (EU) No 961/2010.

The SSM is also the national supervisory authority under the Nuclear Activities Act (1984:3) and the Nuclear Activities Ordinance (1984:14). Nuclear activities must be conducted in accordance with the obligations resulting from the international agreements to which Sweden is party that aim to prevent the proliferation of nuclear weapons. The SSM is also the national contact point for the IAEA's database covering the illicit trafficking and other unauthorised handling of nuclear materials and other radioactive substances.

The SSM cooperates with other authorities on export control matters, in particular the ISP. The SSM is also supported by the technical expertise of the Swedish Defence Research Agency, but does itself have a high level of expertise in the field of nuclear technology.

### **Control of nuclear exports**

Nuclear materials (uranium, plutonium and thorium) and nuclear technology items are classified as dual-use items, and are consequently governed by the Dual-Use Regulation. Exports to countries outside the EU require licences, but the EU's general export licences do not apply to these items. For several items licences are also required for transfers within the EU.

When an application for a licence to export nuclear materials is submitted, the SSM assesses, in parallel, the issue of the possible transfer of the nuclear material in accordance with the Nuclear Activities Act (1984:3) and the Nuclear Activities Ordinance (1984:14). For spent nuclear fuel, the SSM also investigates the issue of the material's final disposal. With regard to spent nuclear fuel originating from nuclear

activities in Sweden, the application has to include an assurance that the exporter will recover the material if it cannot be disposed of in the intended manner. Furthermore, the SSM decides how nuclear material will be transported with the aim of preventing radiological accidents and to ensure that there is adequate physical protection.

The conditions imposed in decisions concerning export licences are based on the guidelines agreed within the Nuclear Suppliers Group (NSG) (see section 3.5). The guidelines include obtaining certain specified assurances from the government of the recipient country before a licence to export can be granted. These assurances shall state that the items are not use for nuclear weapons or nuclear explosive devices, that the IAEA has full safeguarding rights in the country and that nuclear material in the country has adequate physical protection. In addition, there must be a guarantee that re-exportation will not take place without corresponding assurances. The SSM is tasked by the Government with obtaining these assurances from the government of the country in receipt of exports of nuclear technology, as well as with drawing up and submitting Swedish assurances to exporting countries when Sweden imports such nuclear material. However, in the case of initial transactions, the Ministry for Foreign Affairs obtains the assurances for exports or provides assurances for imports.

All EU Member States are also members of the European Atomic Energy Community (via the Euratom Treaty), one purpose of which is to establish a common market for special materials and equipment in the field of nuclear energy and to guarantee that nuclear material is not used for anything other than its intended purpose. All the EU Member States have also ratified the Treaty on the Non-Proliferation of Nuclear Weapons (NPT) and have entered into control agreements with the IAEA with associated additional protocols. The Government is of the opinion that the existing licensing procedure for trade within the EU, in accordance with the Dual-Use Regulation and the commitments of the Member States within the scope of Euratom, normally provides sufficient safeguards in the transfer of nuclear material and nuclear technologies between EU Member States and are in accordance with the NSG Guidelines.

The European Atomic Energy Community is authorised under the Euratom Treaty to enter into agreements with third countries. Bilateral agreements on the peaceful use of nuclear energy have been entered into with Australia, Canada, Japan, Kazakhstan, Ukraine, the United States, the United Kingdom and Uzbekistan. A corresponding agreement between Euratom and South Africa entered into force in 2022, but it has not yet been supplemented with administrative arrangements.

All EU Member States have undertaken to report exports of nuclear material and nuclear technologies to the IAEA, under the Additional Protocol to the Safeguards Agreement with the IAEA, in the case of Sweden INFCIRC/193/Add.8. For Sweden, this means that the European Commission, through its safeguards under the Euratom Treaty, reports exports of nuclear material to the IAEA and that the SSM reports exports of nuclear technologies to the IAEA. In contrast to what applies to other dual-use items, this reporting requires the SSM to be notified of exports or transfers within the EU of nuclear technologies listed in Annex 1, Category 0 of the Dual-Use Regulation.

During 2024, the SSM dealt with 128 applications received concerning exports or transfers within the EU, and decided on export licences in 121 cases. Details of the export licences granted by the SSM in 2024 can be found in Annex 2, Table 49.

The SSM makes contact with the companies affected by its safeguarding activities where necessary. In its supervisory role, the SSM supervises companies to ensure that they are aware of and comply with the requirements made on them in the event of intra-EU transfers or extra-EU exports of dual-use items. One supervision was carried out in 2024.

## 5 Statistical report

### Changes in reporting

The final report Stricter export control of military equipment (SOU 2015:72) included certain proposals on improved openness and transparency on issues concerning exports of military equipment. The Government's assessment within the Government Bill Stricter export control of military equipment (Govt Bill 2017/18:23) mainly agreed with the committee's proposals. The Government noted in the Bill that the annual communication on strategic export controls and dual-use items presented by the Government to the Riksdag represents an important element in the work to foster openness and transparency in the area of export controls. The Government also stated in the Bill its intention to revise the communication, in close cooperation with the ISP, with the aim of presenting more information.

In connection with the Government's communication Strategic Export Controls in 2018 – Military Equipment and Dual-Use Items (Comm. 2018/19:114), a thorough restructuring of the statistical reporting was carried out to present data in a clearer and more informative manner based on the different stages of the export process, in terms of both military equipment and dual-use items. Since then, further additions and improvements have been made. The information added in recent years includes denial decisions, agreements on cooperation and licence production, and Swedish companies' ownership abroad. In particular, more detailed information is now reported on granted export licences and actual exports of military equipment. In view of the support that Sweden has provided to Ukraine for its defence against Russia's full-scale invasion, this year's statistics, like last year's, contain a separate table on export licences granted for donations of military equipment to Ukraine.

Swedish exports of military equipment in 2024 are presented in Annex 1 and exports of dual-use items in Annex 2.

Military equipment

What constitutes military equipment is set out in the annex to the Military Equipment Ordinance (1992:1303), known as the List of Military Equipment. Section A in this list corresponds to the EU Common Military List and is broken down into 20 categories of equipment, ML1-ML20, software (ML21) and technical assistance (ML22). As well as the 22 categories, the list contains three national supplements (nuclear explosive devices, fortification facilities and certain chemical warfare agents). Table 1 shows broadly which military equipment is included in each ML category.

In the Swedish list of military equipment, the EU Common Military List is supplemented by a division into military equipment for combat purposes (MEC) and other military equipment (OME). Military equipment for combat purposes means equipment with a destructive impact including sights for such equipment and fire control equipment. Certain parts and components for military equipment for combat purposes, as well as equipment that does not have a directly destructive impact, are counted as other military equipment.

This communication mainly presents the equipment according to the ML categories of the List of Military Equipment and broken down into MEC and OME. Where a table states that export licences have been granted or that exports have been made within a particular ML category, this refers to one or more items in that category. It does not mean that export licences have been granted or that there have been exports of every one of the items in that category of equipment.

Table 1      Categories of military equipment

Category	Equipment
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.
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 and accessories and specially designed components for these weapons.
ML3	Ammunition and fuse setting devices and specially designed components therefor.
ML4	Bombs, torpedoes, rockets, missiles, other devices and charges with explosive effect and associated equipment and accessories and specially designed components therefor.
ML5	Fire control, and related alerting and warning equipment, and related systems, test and alignment and countermeasure equipment, specially designed for military use, and specially designed components and accessories therefor.

Category	Equipment
ML6	Ground vehicles and components.
ML7	Chemical or biological toxic agents, “riot control agents”, radioactive materials, related equipment, components and materials.
ML8	“Energetic materials” and related substances.
ML9	Vessels of war (surface or underwater), special naval equipment, accessories, components and other surface vessels.
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.
ML11	Electronic equipment, “spacecraft” and components not specified elsewhere on the EU Common Military List.
ML12	High velocity kinetic energy weapon systems and related equipment, and components specially designed for these weapons.
ML13	Armoured or protective equipment, constructions and components.
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 for these.
ML15	Imaging or countermeasure equipment, specially designed for military use, and specially designed components and accessories therefor.
ML16	Forgings, castings and other unfinished goods, the use of which in a specified item is identifiable by material composition, geometry or function, and which are specially designed for any items specified by ML1 to ML 4, ML6, ML9, ML10, ML12 or ML19.
ML17	Miscellaneous equipment, materials and “libraries”, and components specially designed therefor.
ML18	Production equipment and components.
ML19	Directed Energy Weapon (DEW) systems, related or countermeasure equipment and test models, and specially designed components for these.
ML20	Cryogenic and “superconductive” equipment, and specially designed components and accessories for these.
ML21	“Software”
ML22	“Technology”

## Manufacturing and suppliance

A basic manufacturing licence is required for the manufacturing of military equipment in Sweden. Manufacturing means the production of military equipment or parts thereof which constitute military equipment. The licence requirement also applies if the manufacturer of the military equipment is solely the subcontractor of another party which holds a licence to manufacture military equipment.

Licences are required for the supply of military equipment, inventions concerning military equipment and methods for the production of military equipment in and outside Sweden. The same applies to activities relating



to provision of technical assistance to a party abroad. Supply means sale, granting, offering for payment, loan, gift and brokering. The licence requirement applies to Swedish companies, a party resident or permanently domiciled in Sweden and Swedish authorities. Trading in firearms or parts of such weapons is exempt from requirements for these licences. Licences for such trading are governed by provisions of the Offensive Weapons Act.

The companies, authorities and private individuals who hold licences to manufacture or supply military equipment are under the supervision of the Inspectorate of Strategic Products (ISP) and must, on request, provide the information and documents needed for supervisory control and grant the ISP access to premises where the activity is undertaken. Licence holders are also obliged to submit reports in various respects to the ISP.

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Swedish defence industry

In 2024, manufacturing or supplier licences were held by 450 Swedish companies, authorities and private individuals. The number of licence holders has more than doubled since the new legislation entered into force in 2018. The increase relates principally to subcontractors of system manufacturers of military equipment.

Among the licence holders, 86 exported military equipment or technical assistance, while 219 only supplied military equipment within the country. 145 licence holders did not report any sale of military equipment. Table 2 shows the total value of sales of military equipment in and outside Sweden in the past five years.

Table 2      Total value of invoiced military equipment in and outside Sweden 2020–2024 (SEK million)<sup>1</sup>

	2020	2021	2022	2023	2024
Total value	30,531	35,346	29,407	35,518	46,967

Despite the large number of manufacturing and supplying companies, a handful of these account for the majority of sales. Table 3 shows the fifteen largest operators in terms of sales of military equipment in and outside Sweden.

Table 3      The 15 largest defence companies and government agencies in terms of invoiced and supplied military equipment in and outside Sweden in 2024 (SEK)

Companies	Value	Principal area of equipment
Saab AB	SEK 17,303,763,470	Combat aircraft, radar systems, etc.

Companies	Value	Principal area of equipment
Saab Dynamics AB	SEK 7,267,582,341	Missile and ground combat systems
Swedish Defence Materiel Administration (Försvarets materielverk or FMV)	SEK 3,332,387,640	Leasing of combat aircraft
BAE Systems Hägglunds AB	SEK 2,662,527,768	Tracked vehicles and armoured vehicles
BAE Systems Bofors AB	SEK 2,007,997,307	Artillery systems
Nammo Sweden AB	SEK 1,520,320,202	Ammunition
GKN Aerospace Sweden AB	SEK 1,269,208,210	Maintenance of aero-engines
Saab Kockums AB	SEK 1,209,548,500	Surface and submarine craft
EURENCO Bofors AB	SEK 1,077,715,163	Gunpowder and explosives
FFV Ordnance AB	SEK 883,362,880	Ground combat systems
Scania CV AB	SEK 663,462,603	Ground vehicles
Norma Precision AB	SEK 647,075,777	Hunting and sport shooting ammunition
Saab Barracuda AB	SEK 405,141,983	Camouflage products
SSAB EMEA AB	SEK 383,753,904	Armour plates
PartnerTech Karlskoga AB	SEK 378,160,714	Mechanical components

1, 2 Activities relating to the provision of technical assistance in Sweden do not normally require any licence. The exception is technical assistance for inventions concerning military equipment and methods for the production of military equipment. A review of the delivery declarations submitted to the ISP has revealed that many licence holders have reported the kind of technical assistance that does not require a licence. Therefore, in order to give a more accurate picture of the activities subject to licensing carried out in the country, such technical assistance (ML22) has been omitted from the information reported in Tables 2 and 3.

## Activities related to other countries

The licensing process concerning the export of military equipment has several parts. These statistics report marketing and advance rulings, tender notifications, export licences and actual exports. In addition, some other activities related to other countries such as cooperation agreements and further transfer of military equipment are reported.

## Data in the report

The countries indicated in the statistics in most cases are the final recipient countries for the military equipment stated. As far as possible, the ISP endeavours to extend the export controls, in other words to follow the Swedish military equipment, right to the end-user country. Some components and sub-systems are acquired by foreign system manufacturers for use in the production of military equipment intended for several different final recipients. It is not possible in these cases to know in advance who the end-user is, and the control assessments are therefore focused on the system manufacturer and the country in which the latter operates. Examples of such items include explosives and armour plates.

Some caution should be exercised in reading off trends from the numerical material. Some statistical data from previous years is therefore presented for comparison. A more accurate picture is provided when looking at exports over the course of time as individual sales and deliveries may cause wide fluctuations in the statistics. The financial value stated nevertheless does not provide a full picture of the practical situation in comparison with a particular country or region. An individual transaction may have a great impact on the aggregated export statistics.

Marketing and advance rulings

Marketing military equipment abroad or in Sweden does not require a licence in the individual case. However, a party holding a basic licence to manufacture or supply military equipment is obliged to present a report on the marketing of military equipment or technical assistance that has been undertaken abroad. This report is based on the regular meetings which the ISP holds with the defence companies regarding their export plans. The marketing meetings enables the ISP at an early stage in the export process to steer exporters away from markets for which licences at a later stage cannot be anticipated. This arrangement means that most of the ISP’s negative decisions are delivered informally at the marketing meetings, and that actual applications relating to undesirable recipient countries are reduced.

In the event that an exporter wishes to examine at an early stage whether an export of military equipment or supply of technical assistance is possible, the exporter can request an advance ruling in writing from the ISP. This may relate, for example, to a previously unexamined recipient country or take place ahead of a major marketing campaign. There is no statutory requirement that an advance ruling must be requested. The decisions are non-binding and are issued on the basis of the circumstances prevailing at the time. A renewed examination is always conducted at the time of any tender notification and when an application is made for an export licence, even if a positive advance ruling has already been made.

Table 4 shows the number of advance rulings in writing concerning military equipment issued by the ISP in the past five years.

Table 4      Number of written advance rulings made concerning military equipment in 2020–2024

Type of case	2020	2021	2022	2023	2024
Advance rulings	25	18	18	24	19

In 2024, a total of 19 advance rulings were issued for 11 countries outside the established circle of recipient countries. Of these, 16 were positive and three were negative.

**Tender notifications**

No later than four weeks before a binding tender for the sale of military equipment is submitted or a purchase contract is entered into, the ISP must be informed accordingly. If the ISP has no objection to tenders being submitted, no action is taken. In individual cases the ISP may prohibit tenders being submitted or contracts being entered into. The requirement for tender notification means a further control step in the export process and reduces the risk of the Swedish defence industry entering into contracts concerning deals which, for example, would run counter to Swedish foreign policy.

A tender notification need not be issued if the tender or contract exclusively relates to spare parts, components or technical assistance for equipment exported previously. It is possible to apply for a general exemption from the duty of notification for particular equipment to specifically stated countries. Most major exporting companies obtain general exemptions for tenders worth less than SEK 250 million to countries within the European Union and certain other established partner countries. A large proportion of the tender notifications received by the ISP therefore relate to countries outside the circle of established partner countries.

Table 5 shows the number of tender notifications and general exemptions over the most recent five-year period.

**Table 5            Number of approved tender notifications and general exemptions concerning military equipment 2020–2024**

Type of case	2020	2021	2022	2023	2024
Tender notification	250	255	346	440	500
General exemption	22	26	25	19	22
<b>Total</b>	<b>272</b>	<b>281</b>	<b>371</b>	<b>459</b>	<b>522</b>

The ISP was notified of a total of 500 tenders to a party abroad in 2024. A total of 491 tender cases were decided during the year and in 453 of these cases, the notification was submitted without further action. These cases concerned a total of 68 countries and one international organisation. A prohibition on submitting tenders was notified in two cases concerning a total of two countries. The other decisions concerned removal of the case from the register.

**Export licences**

Exports of military equipment and supply of technical assistance to any party outside Sweden require licences from the ISP. Applications for export licences may be preceded by an advance ruling, and in exporting for sale must be preceded by a tender notification. There are three types of export licences. Individual licences are issued for a specific quantity to a

recipient in a specific country. Global licences make it possible to export an unspecified quantity of military equipment to more than one recipient in more than one country. General licences are not limited in quantity or value and make it possible to export to all EEA countries. With certain exceptions, an export licence is also required for the transit of military equipment through Sweden.

The communication presents individual and global licences which have been issued regarding the sale of military equipment. The value and scope of the licences issued by the ISP provide merely an indication of what actual exports may look like in subsequent years. This is due in part to not all licences being utilised and to the fact that actual deliveries may take place several years after the export licence has been issued. The aggregate value of granted export licences becomes an increasingly poor indicator of the value of the coming year’s deliveries as more global licences are issued and more general licences are used.

Table 6 shows the number of processed applications for export licences over the past five years.

**Table 6**            **Number of processed applications for exports of military equipment 2020–2024**

Type of licence	2020	2021	2022	2023	2024
Individual	570	589	602	659	814
Global	458	449	492	606	659
Transit	58	47	73	46	55
Total	1,086	1,085	1,167	1,311	1,528

Table 7 shows the value and percentage change regarding granted export licences for military equipment in the past five years, broken down into MEC and OME.

**Table 7**            **The value of granted export licences in current prices and annual percentage change 2020–2024 (SEK million)**

Category of equipment	2020	2021	2022	2023	2024
Military equipment for combat purposes	7,165 (+1.7)	3,735 (-48)	16,454 (+340)	19,512 (+19)	35,013 (+79)
Other military equipment	7,781 (+20)	10,925 (+40)	5,462 (-50)	8,864 (+62)	15,538 (+75)
Total	14,946 (+11)	14,660 (-1.9)	21,915 (+49)	28,376 (+29)	50,551 (+78)

Table 8 shows the individual and global export licences issued in 2024 concerning sale of military equipment. The table contains information on the number of licences issued per country, the total value and, at an aggregated level, which categories of equipment the licences concerned. Note that some export licences cover several recipient countries, so that the total number of licences does not match the sum of individual licences.

**Table 8**            **Granted export licences for sale of military equipment by country in 2024**

Country	Number of licences	Categories of military equipment	MEC/O ME	Value of licences
<b>EU</b>				
Belgium	19	2,3,5,6,8,10,13,15,17,18,21,22	MEC, OME	1,449,691,416
Bulgaria	12	1,2,3,4,5,8,11,13,15,18,21,22	MEC, OME	8,000,000
Cyprus	2	2,5,13,15,21,22	OME	0
Denmark	53	1,2,3,4,5,6,7,8,10,11,13,14,15,17,21,22	MEC, OME	187,666,649
Estonia	15	1,2,5,6,13,15,17,21,22	OME	559,211,600
Finland	43	1,2,3,4,5,6,7,8,9,10,11,13,14,15,17,18,21,22	MEC, OME	574,094,864
France	53	1,2,3,5,6,8,11,13,14,15,17,21,22	MEC, OME	2,128,702,285
Greece	7	2,5,11,13,14,15,21,22	OME	3,365,000
Ireland	8	2,4,5,6,13,15,17,21,22	MEC, OME	2,508,363
Italy	32	2,3,4,5,8,9,13,14,15,17,21,22	MEC, OME	855,425,890
Croatia	5	1,2,3,5,8,13,15,21,22	MEC, OME	9,327,912
Latvia	10	1,2,3,5,13,15,17,21,22	MEC, OME	105,766,377
Lithuania	6	2,3,4,5,13,15,17,21,22	MEC, OME	53,053,184
Luxembourg	4	2,3,5,13,15,17,21,22	MEC, OME	54,782,000
Malta	2	2,5,13,15,21,22	OME	0

Country	Number of licences	Categories of military equipment	MEC/O ME	Value of licences
The Netherlands	46	1,2,3,4,5,6,10,11,13,14,15,17,18,21,22	MEC, OME	425,743,310
Poland	36	2,3,4,5,6,8,9,11,13,14,15,17,18,21,22	MEC, OME	14,003,362,462
Portugal	9	1,2,3,5,11,13,15,21,22	MEC, OME	60,674,000
Romania	4	5,11,13,22	OME	10,969,440
Slovakia	11	2,3,5,8,13,15,17,21,22	MEC, OME	148,105,929
Slovenia	9	1,2,3,5,8,10,13,15,17,21,22	MEC, OME	4,932,000
Spain	34	1,2,3,4,5,7,8,11,13,15,17,21,22	MEC, OME	119,776,755
Sweden	3	4,5,11,17,18,21,22	MEC, OME	3,500,000
Czech Republic	20	1,2,3,4,5,8,10,13,14,15,17,18,21,22	MEC, OME	437,766,883
Germany	80	1,2,3,4,5,6,8,9,10,11,13,14,15,17,18,21,22	MEC, OME	8,197,948,057
Hungary	13	2,3,4,5,8,10,13,15,17,21,22	MEC, OME	5,045,837,315
Austria	9	2,3,5,8,10,13,15,17,21,22	MEC, OME	27,080,500
<b>Total</b>	<b>478</b>			<b>34,477,292,191</b>

**REST OF EUROPE**

Iceland	7	2,5,10,13,15,17,21,22	OME	9,600,000
Liechtenstein	1	13	OME	0
Montenegro	1	11	OME	200,000
Norway	61	1,2,3,4,5,6,7,8,10,11,13,15,17,18,21,22	MEC, OME	532,290,533
Switzerland	23	2,3,4,5,8,13,14,15,17,18,21,22	MEC, OME	235,268,876
United Kingdom	78	1,2,3,4,5,6,8,9,10,11,13,14,15,17,18,21,22		1,165,386,538
Türkiye	4	10,13	OME	52,650,000
Ukraine	30	2,3,4,5,6,7,9,10,11,13,14,15,16,17,18,19,	MEC, OME	450,832,269

Country	Number of licences	Categories of military equipment	MEC/O ME	Value of licences
		20,21,22		
Total	197			2,446,228,216
NORTH AMERICA				
Canada	10	2,3,4,5,6,8,11,13,15,17,18,21,22	MEC, OME	1,882,084,210
USA	98	1,2,3,4,5,6,8,10,11,13,14,15,17,18,21,22	MEC, OME	9,248,418,108
Total	106			11,130,502,318
CENTRAL AMERICA				
Mexico	1	13	OME	0
Total	1			0
SOUTH AMERICA				
Argentina	1	13	OME	0
Brazil	14	2,3,4,5,8,10,11,13,14,15,17,18,21,22	MEC, OME	157,643,220
Chile	1	13	OME	0
Peru	1	11	OME	160,000
Uruguay	1	13	OME	0
Total	15			157 803,220
NORTH EAST ASIA				
Japan	20	2,3,4,5,13,14,15,17,18,21,22	MEC, OME	646,345,681
South Korea	15	2,5,8,10,13,14,15,21,22	MEC, OME	627,661,957
Total	33			1,274,007,638
SOUTH EAST ASIA				
Brunei	1	2.22	OME	0
Indonesia	6	11	OME	548,000
Malaysia	3	2,3,13,21	MEC, OME	330,000
Singapore	12	4,5,7,8,9,13,14,21,22	MEC, OME	181,863,050
Thailand	3	4,5,10,11,14,15,17,21,22	MEC, OME	36,478,988
Total	24			219 220,038



Country	Number of licences	Categories of military equipment	MEC/O ME	Value of licences
<b>SOUTH ASIA</b>				
India	14	2,3,5,10,13,14,18, 21,22	MEC, OME	8,821,614
Pakistan	3	4,5,10,11,18,21,22	OME	8,300,000
<b>Total</b>	<b>17</b>			<b>17 121,614</b>
<b>MIDDLE EAST</b>				
United Arab Emirates	5	2,4,5,6,10,11,15,1 6,17,18,21,22	OME	443,645,000
Kuwait	2	7,17,21,22	OME	0
Saudi Arabia	2	4,11,16,22	OME	0
<b>Total</b>	<b>9</b>			<b>443 645,000</b>
<b>REST OF AFRICA</b>				
Kenya	2	14,17,21	OME	12,758,832
South Africa	6	2,3,4,13,18,21,22	MEC, OME	19,011,483
<b>Total</b>	<b>8</b>			<b>31 770,315</b>
<b>OCEANIA</b>				
Australia	16	2,3,5,8,11,13,15,1 7,18,21,22	MEC, OME	37,078,746
New Zealand	10	2,3,5,13,14,15,17, 21,22	MEC, OME	34,844,700
<b>Total</b>	<b>24</b>			<b>71 923,446</b>
<b>TOTAL</b>	<b>893</b>			<b>50,550,908,217</b>

## On donations of military equipment to Ukraine in particular

Tables 6–8 show export licences for the sale of military equipment. Additionally during 2024, the ISP granted a licence for the export of military equipment that the Government, after approval by the Riksdag, had decided to donate to Ukraine. Table 9 shows the number of licences for donations to Ukraine, as well as the categories of material covered by the licences at aggregated level. The total number of such licences in 2024 was 52, which was more than double the year before when 21 licences were issued.

**Table 9**                      **Granted licences for donation of military equipment to Ukraine 2024**

Country	Number	Categories of equipment
Ukraine	52	ML1/MEC, ML1/OME, ML2/MEC, ML2/OME, ML3/MEC, ML3/OME, ML4/MEC, ML4/OME, ML5/MEC, ML5/OME, ML6/MEC, ML6/OME, ML7/OME, ML8/MEC, ML9/MEC, ML10/OME, ML11/OME, ML13/OME, ML14/OME, ML15/OME, ML16/OME, ML17/OME, ML18/OME, ML21/OME, ML22/OME

**Follow-on deliveries and international military equipment cooperation**

Follow-on deliveries to previously supplied military equipment occupy a special position in the Swedish export guidelines. According to the guidelines, licences should be granted for the exporting of spare parts for military equipment which has previously been exported or transferred with a licence, unless there is an unconditional obstacle. The same should apply to special ammunition for previously supplied military equipment and other deliveries directly connected to previously supplied military equipment. Follow-on deliveries should be assessed on a case-by-case basis under these circumstances. The previous guidelines apply for follow-on deliveries to exports approved before 15 April 2018.

Both the Riksdag and the Government have established on repeated occasions that internal cooperation on the development and production of military equipment is crucial to the Swedish defence industry. The Government states in the Government Bill Stricter Export Controls for Military Equipment (Govt Bill 2017/18:23) that cooperation with the Nordic countries, the six nation group, countries in the EU and Australia, Brazil, Canada, Japan, Liechtenstein, New Zealand, South Africa, South Korea and the United States are of greatest interest. The Government Bill goes on to state that a balance must be struck in international partnerships in making an overall assessment of how the need for international cooperation is to be reconciled with the interests of effective export controls. It is noted that it is not self-evident that Sweden will always be able to count on sympathy for all aspects that are unique to its approach with regard to exports to third countries.

Historically there has been interest in those licences granted for exports to countries outside the traditional circle of cooperation. Table 10 presents more detailed information on licences granted to end-user countries outside the circle of countries identified above. It is first indicated whether the licences have related to follow-on deliveries or transactions not linked to previous exports, and then whether these licences have been granted under international collaboration with a country in the traditional partnership group, or whether the export has gone straight from Sweden to the final recipient. The column on the far right shows which categories of equipment have been approved for any new transactions. Note that an

**Table 10 Detailed description of granted export licences for sale of military equipment to certain countries in 2024**

Country	Total number of licences granted	Of which follow-on deliveries	Of which international cooperation	Categories of equipment – new deals
Algeria	3	3	2	
Argentina	1	1	0	
Brunei	1	1	0	
Chile	1	1	0	
UAE	5	4	0	ML5, ML6, ML21, ML22
India	14	13	2	ML10, ML22
Indonesia	6	6	2	
Kenya	2	1	0	ML14, ML17, ML21, ML22
Kuwait	2	2	1	
Malaysia	3	3	0	
Mexico	1	1	0	
Pakistan	3	3	0	
Peru	1	0	1	ML11
Saudi Arabia	2	2	2	
Singapore	12	10	2	ML5, ML7, ML21, ML22
Thailand	3	3	0	
Tunisia	1	1	0	
Türkiye	4	3	0	ML10
Ukraine	30	19	16	ML3, ML4, ML5, ML6, ML9, ML13, ML17, ML18, ML22
Total	95	76	28	

**General export licences**

The ISP decided in 2012 to introduce five different types of general licences. The licences make simplified transfers possible within the European Economic Area (EEA). Use of general licences does not require any application. The holder of a basic supplier licence instead has to inform the ISP no later than four weeks prior to the first day on which a general licence is used. General licences are not limited in quantity or value. In 2021, the ISP decided to replace three of the previous licences with a new one.

Each category has an appendix describing the military equipment and technical assistance it covers. Table 11 shows the different types of general licences that were valid in 2024.

**Table 11      Types of general licences concerning export of military equipment**

TFS number	Scope
2012:7	The transfer of military equipment and the provision of technical assistance to armed forces or a contracting authority in a country within the European Economic Area (EEA)
2012:8	The transfer of military equipment and the provision of technical assistance to a certified recipient in a country within the European Economic Area (EEA)
2021:2	The export of military equipment and the provision of technical assistance to a specific recipient in a country within the European Economic Area (EEA) for demonstration, evaluation, exhibition, maintenance or repair, and after maintenance, repair or demonstration in Sweden.

Table 12 shows the number of notifications of use of the different general licences during 2024.

**Table 12      Notification of use of general licences concerning export of military equipment in 2024**

	TFS 2012:7	TFS 2012:8	TFS 2021:2
Number of notifications	0	0	2

Table 13 shows a listing of all notifications of use of the various general licences since they were introduced in 2012.

**Table 13      Notification of use of general licences concerning export of military equipment since their introduction in 2012**

	TFS 2012:7	TFS 2012:8	TFS 2012:9	TFS 2012:10	TFS 2012:11	TFS 2021:2
Number of notifications	20	11	29	14	16	28

**Denials**

The Swedish export control system, with its mandatory reporting of marketing abroad and the opportunity for written advance rulings, leads to the majority of the ISP’s negative decisions being delivered at an early

stage and the number of actual applications regarding undesirable recipient countries being reduced. However, a renewed examination is always conducted in connection with tender notifications and when an application is made for an export licence.

During 2024, the ISP decided on a total of 2 formal denials. Formal denials refer to both decisions to prohibit tenders being submitted, and denials of applications for exports. In accordance with the provisions in the EU’ Common Position, other Member States are notified of denials on an ongoing basis. Table 14 shows the number of denial decisions per country.

**Table 14      Number of denial decisions per country in 2024**

Country	Number of licences denied
Thailand	1
Türkiye	1
Total	2

Table 15 shows the number of denial decisions per country divided up by five-year period since 2006.

**Table 15      Number of denial decisions per country by period since 2006**

2006–2010	Number	2011–2015	Number	2016–2020	Number	2021–2024	Number
Argentina	2	Saudi Arabia	8	Türkiye	23	Bahrain	2
Libya	2	UAE	7	UAE	8	Qatar	2
Russia	2	Egypt	6	Saudi Arabia	8	Saudi Arabia	2
Algeria	1	Colombia	4	Qatar	7	Taiwan	2
Azerbaijan	1	Pakistan	4	Philippines	6	Vietnam	2
Bangladesh	1	Vietnam	4	Taiwan	5	Bangladesh	1
UAE	1	Bahrain	3	Bangladesh	4	Bosnia and Herzegovina	1
Israel	1	India	3	Jordan	4	Egypt	1
Jordan	1	Israel	3	Thailand	4	Philippines	1
Macedonia	1	Tunisia	3	Egypt	3	Guinea Bissau	1
Mauritius	1	Türkiye	3	Ukraine	3	Israel	1
Serbia	1	Indonesia	2	India	2	Kazakhstan	1
Syria	1	Kazakhstan	2	Morocco	2	Pakistan	1
Ukraine	1	China	2	Pakistan	2	South Africa	1
Total	17	Lebanon	2	Serbia	2	Thailand	1

2006– 2010	Numb er	2011–2015	Numbe r	2016–2020	Num ber	2021–2024	Numb er
		Russia	2	Armenia	1	Tunisia	1
		Serbia	2	Bahrain	1	Türkiye	1
		Thailand	2	Bosnia and Herzegovina	1	Turkmenist an	1
		Algeria	1	Ecuador	1	<b>Total</b>	<b>23</b>
		Armenia	1	Israel	1		
		Azerbaijan	1	China	1		
		Equatorial Guinea	1	Kuwait	1		
		Cote d'Ivoire	1	Lebanon	1		
		Philippines	1	Oman	1		
		Gabon	1	Senegal	1		
		Iran	1	Sierra Leone	1		
		Kuwait	1	Tunisia	1		
		Macedonia	1	Uzbekistan	1		
		Myanmar	1	<b>Total</b>	<b>96</b>		
		Namibia	1				
		Nepal	1				
		Oman	1				
		Paraguay	1				
		Taiwan	1				
		Ukraine	1				
		<b>Total</b>	<b>79</b>				

### Actual exports

The actual exporting presented in the communication concerns military equipment and technical assistance both supplied and invoiced during the current year. The data is based on the declarations which each holder of manufacturing or supplier licences is obliged to report to the ISP. The actual exports as a rule are the part of the report that attracts most interest in the Riksdag, among the general public and in the media. The communication therefore contains a number of tables with different interfaces concerning annual exports.

Table 16 shows the value of actual exports of military equipment by country in 2024. The table is broken down into MEC/OME and contains, at an aggregated level, information about which categories of equipment the exports related to. Military equipment was exported to a total of 59 countries in 2024.

**Table 16**      **Value of actual exports of military equipment by country in 2024 (SEK)**

Skr. 2024/25:114  
Bilaga 1

Country	Categories of military equipment	Value of MEC	Value of OME	Total
<b>EU</b>				
Belgium	1,2,3,6,8,10,14,21,22	47,092,364	23,946,640	71,039,004
Bulgaria	1,3,4,5,8,13,21,22	120,846,175	133,043,573	253,889,748
Denmark	1,2,3,5,6,7,8,10,11,13,14,17,21,22	12,939,336	201,882,342	214,821,678
Estonia	1,2,3,5,6,7,15,17,22	102,549,883	402,458,729	505,008,612
Finland	1,2,3,4,5,6,8,10,11,13,14,17,21,22	288,818,872	232,482,338	521,301,210
France	1,2,3,4,5,6,8,11,13,14,15,17,21,22	271,178,211	453,948,669	725,126,880
Greece	5,11,13,14	0	3,126,764	3,126,764
Ireland	1,2,5,6,15,17,22	879,224	12,993,443	13,872,667
Italy	2,3,4,5,8,9,13,17,21,22	57,317,223	59,551,753	116,868,976
Croatia	2.3	9,158	2,625,277	2,634,435
Latvia	1,2,3,4,5,13,17	231,725,673	41,702,913	273,428,586
Lithuania	2,3,4,5,13,14,15,17	408,558,128	37,319,272	445,877,400
Malta	3	0	34,886	34,886
The Netherlands	1,2,3,5,6,7,11,13,14,15,17,22	612,403,751	343,575,825	955,979,576
Poland	1,2,3,5,6,8,10,11,13,14,17,21,22	160,997,744	960,245,704	1,121,243,448
Portugal	1,3,5,11,22	3,031,395	1,695,552	4,726,947
Romania	3.11	0	1,805,728	1,805,728
Slovakia	1,3,5,8,13,17,22	50,458,700	18,022,410	68,481,110
Slovenia	1,3,13,17	0	1,357,961	1,357,961
Spain	1,3,4,5,8,11,13,21,22	33,939,826	56,437,536	90,377,362
Czech Republic	1,2,3,4,5,8,13,14,17,22	3,438,664	785,390,212	788,828,876

Country	Categories of military equipment	Value of MEC	Value of OME	Total
Germany	1,2,3,4,5,6,8,9,11,13,14,17,21,22	125,906,715	1,940,324,296	2,066,231,011
Hungary	1,3,4,5,8,10,13,17,22	400,117,274	1,983,410,380	2,383,527,654
Austria	1,2,3,6,8,10,13,14,17	141,627,272	117,449,029	259,076,301
Total		3,073,835,588	7,814,831,232	10,888,666,820
REST OF EUROPE				
Andorra	3	0	627,422	627,422
Iceland	3,8,10,17	42,122	2,518,847	2,560,969
Montenegro	11	0	191,050	191,050
Norway	1,2,3,4,5,6,7,8,10,11,13,14,15,17,18,21,22	356,612,239	295,144,220	651,756,459
Switzerland	1,2,3,5,6,8,10,13,15,17,22	22,899,968	428,735,769	451,635,737
United Kingdom	1,2,3,4,5,8,9,11,13,14,15,16,17,18,21,22	459,994,494	361,048,239	821,042,733
Türkiye	10,11,13	0	31,686,318	31,686,318
Ukraine	2,3,4,5,6,9,13,15,17,18,21,22	471,642,690	138,156,915	609,799,605
Total		1,311,191,513	1,258,108,780	2,569,300,293
NORTH AMERICA				
Canada	2,3,5,8,11,13,15,17,21,22	11,938,409	127,289,963	139,228,372
USA	1,2,3,4,5,6,8,10,11,13,14,15,17,18,21,22	2,739,435,463	1,843,827,397	4,583,262,860
Total		2,751,373,872	1,971,117,360	4,722,491,232
CENTRAL AMERICA				
Mexico	2,5,13	0	22,550,329	22,550,329
Total		0	22,550,329	22,550,329
SOUTH AMERICA				



Country	Categories of military equipment	Value of MEC	Value of OME	Total
Brazil	2,3,4,5,10,11,13,14,15,17,18,21,22	1,098,476,113	1,470,926,721	2,569,402,834
Chile	3	0	169,339	169,339
Peru	1.11	0	132,497	132,497
<b>Total</b>		<b>1,098,476,113</b>	<b>1,471,228,557</b>	<b>2,569,704,670</b>

**NORTH EAST ASIA**

Japan	2,3,4,5,13,14,17,18,22	231,502,169	43,572,909	275,075,078
South Korea	4,5,8,13,14,18,22	15,750,566	147,377,003	163,127,569
<b>Total</b>		<b>247,252,735</b>	<b>190,949,912</b>	<b>438,202,647</b>

**SOUTH EAST ASIA**

Brunei	22	0	82,610	82,610
Indonesia	11	0	402,171	402,171
Malaysia	2,6,11,21,22	46,420,000	42,258,678	88,678,678
Singapore	4,5,8,9,13,14,21,22	12,663,676	77,661,221	90,324,897
Thailand	5,6,14,21,22	20,000,000	333,059,919	353,059,919
<b>Total</b>		<b>79,083,676</b>	<b>453,464,599</b>	<b>532,548,275</b>

**SOUTH ASIA**

India	2,3,4,5,13,14,18,22	628,739,646	288,576,259	917,315,905
Pakistan	4,5,10,11,22	0	60,790,921	60,790,921
<b>Total</b>		<b>628,739,646</b>	<b>349,367,180</b>	<b>978,106,826</b>

**MIDDLE EAST**

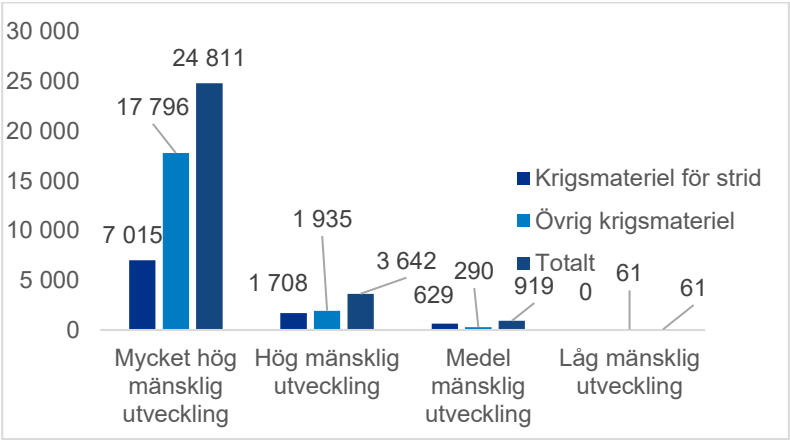
United Arab Emirates	1,5,10,17,22	0	6,152,764,719	6,152,764,719
Israel <sup>2</sup>	5	0	21,379,526	21,379,526
Qatar	17	0	89,508	89,508
Saudi Arabia	2,4,22	46,595,612	24,659,510	71,255,122
<b>Total</b>		<b>46,595,612</b>	<b>6,198,893,263</b>	<b>6,245,488,875</b>

<sup>2</sup> The exports were follow-on deliveries to private companies of components which, at the time of the original export, did not constitute military equipment. The deliveries in 2024 were made on the basis of export licenses issued in previous years. No export licence has been issued for the sale of military equipment since October 2023.

Country	Categories of military equipment	Value of MEC	Value of OME	Total
<b>REST OF AFRICA</b>				
Botswana	3	0	1,141,188	1,141,188
Namibia	3	0	826,918	826,918
South Africa	1,3,4,8,10,13,21,22	16,775,510	168,197,245	184,972,755
Tanzania	3	0	332,208	332,208
Zambia	3	0	740,503	740,503
<b>Total</b>		<b>16,775,510</b>	<b>171,238,062</b>	<b>188,013,572</b>
<b>OCEANIA</b>				
Australia	2,3,5,8,10,11,13,17,21,22	85,186,112	172,786,523	257,972,635
New Zealand	2,3,5,17	12,760,497	7,580,044	20,340,541
<b>Total</b>		<b>97,946,609</b>	<b>180,366,567</b>	<b>278,313,176</b>
<b>INTERNATIONAL ORGANISATIONS</b>				
UN and other international organisations	17	0	1,837,891	1,837,891
<b>Total</b>		<b>0</b>	<b>1,837,891</b>	<b>1 837,891</b>
<b>TOTAL</b>		<b>9,351,270,874</b>	<b>20,083,953,732</b>	<b>29,435,224,606</b>

**Figure 1** Actual exports of military equipment broken down by country according to the Human Development Index\* (SEK million)

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\*The Human Development Index (HDI) is an index by which human development and living standards in a country are measured and compared. The HDI value for a country is geometric mean of normalised indices for each of the dimensions a long and healthy life, being knowledgeable, and having a decent standard of living (measured in GDP per capita).

Table 17 shows exports in 2024 by region. The regional breakdown follows the breakdown in the EU’s annual statistical report to which the ISP contributes statistical material.

**Table 17** Share of actual exports of military equipment in 2024 by region

Region	Percentage
EU	37.0
Middle East	21.2
North America	16.0
South America	8.7
Rest of Europe	8.7
South Asia	3.3
South East Asia	1.8
North East Asia	1.5
Oceania	0.9
Rest of Africa	0.6
Central America and the Caribbean	0.1

Table 18 shows actual exports in 2024 by ML category, broken down into MEC and OME. It should be noted that ML11, ML13–18, and ML20–22 only include OME, which is why these categories are marked with a dash (-) in the MEC column.

**Table 18      The value of actual exports of military equipment in 2024  
by category of equipment (SEK)**

Category of equipment	Value of MEC	Value of OME
ML1	870,045	41,501,629
ML2	1,180,828,004	350,834,886
ML3	3,781,090,191	1,174,233,045
ML4	1,113,123,952	378,612,173
ML5	932,642,360	2,335,402,717
ML6	579,930,000	1,300,931,345
ML7	0	9,255,729
ML8	770,290,267	5,814,917
ML9	89,447,000	4,945,859
ML10	902,604,848	6,850,573,766
ML11	-	355,198,224
ML12	0	0
ML13	-	402,138,683
ML14	-	411,195,730
ML15	-	140,349,416
ML16	-	573,323
ML17	-	307,399,246
ML18	-	65,112,945
ML19	0	0
ML20	-	0
ML21	-	365,193,051
ML22	-	5,585,641,630

Table 19 shows actual exports of small arms, light weapons and Man-Portable Air Defence Systems (MANPADS). The data is included in the report presented by Sweden annually to the UN.

**Table 19      Actual exports in 2024 of small arms, light weapons and  
MANPADS as defined in the UN Register of Conventional  
Arms**

Small arms	
1. Revolvers and self-loading pistols	No exports
2. Rifles and carbines	No exports
3. Sub-machine guns	No exports
4. Assault rifles	No exports
5. Light machine guns	No exports

6. Additional information	Small-calibre ammunition for military purposes or components for such ammunition have been exported to Austria, Canada, Denmark, Estonia, Finland, Germany, Hungary, India, Italy, the Netherlands, Norway, New Zealand, Poland, Slovakia, Slovenia, Spain, Ukraine, and the United States.
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**Light weapons**

1. Heavy machine guns (12.7 mm)	No exports
2. Hand-held underbarrel and mounted grenade launchers	No exports
3. Portable anti-tank guns	No exports
4. Recoilless rifles	Recoilless rifles have been exported to Australia, Finland, France, India, Japan, Malaysia, Poland and the United States. In addition, spare parts, training equipment, components and ammunition for recoilless rifles have also been exported to Australia, Austria, Brazil, Canada, Czech Republic, Denmark, Estonia, Finland, Hungary, India, Ireland, Japan, Latvia, Lithuania, Norway, New Zealand, Poland, Slovakia, Slovenia, South Africa, and the United States.
5. Portable anti-tank missile launchers and rocket systems	Anti-tank missile launchers were exported to France, India, Latvia, South Africa and the United States. In addition, spare parts, training equipment, components and ammunition for anti-tank missile launchers have been exported to Australia, the Czech Republic, Denmark, France, India, Ireland, Latvia, Lithuania, Norway, and the United States.
6. Mortars of calibres less than 75 mm	No exports
7. Additional information	No exports

**MANPADS (Man-Portable Air Defence Systems)**

	MANPADS have been delivered to Latvia. In addition, spare parts, training equipment and components for MANPADS have been exported to Brazil, the Czech Republic, Finland, Pakistan, and Singapore.
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**Actual exports over time**

Individual sales and deliveries of major military equipment systems may cause significant fluctuations in the statistics. The export statistics should

be shown over time to make it easier to identify trends and tendencies in the area of military equipment.

Table 20 shows the value and percentage change compared with the previous year regarding actual exports in the past five years broken down into MEC/OME.

**Table 20      The value of actual exports of military equipment in current prices and annual percentage change 2020–2024 (SEK million)**

Category of equipment	2020	2021	2022	2023	2024
Military equipment for combat purposes	3,459 (+16)	3,821 (+10)	6,533 (+71)	6,968 (+7)	9,351 (+34)
Other military equipment	12,870 (- 3)	16,267 (+26)	8,722 (- 46)	11,049 (+27)	20,084 (+82)
<b>Total</b>	<b>16,328 (0.3)</b>	<b>20,089 (+23)</b>	<b>15,254 (- 24)</b>	<b>18,016 (+18)</b>	<b>29,435 (+63)</b>

Table 21 shows the share of exports of military equipment in total Swedish exports of goods over the past five years. Alongside this communication, Swedish exports of military equipment are reported in the general statistics on foreign trade, which are based on the data submitted to Statistics Sweden by Swedish Customs. Statistics Sweden uses different item categories than the ISP in its reporting and the figures are thus not directly comparable with the ISP’s statistics.

**Table 21      Share of exports of military equipment in total Swedish exports of goods at current prices 2020–2024 (SEK million)**

Type of export	2020	2021	2022	2023	2024
Military equipment exports	16,328	20,089	15,254	18,016	29,435
Total exports of goods	1,427,100	1,626,500	1,999,300	2,100,100	2,068,800
<b>Percentage</b>	<b>1.14%</b>	<b>1.23%</b>	<b>0.76%</b>	<b>0.86%</b>	<b>1.42%</b>

Figure 2 shows the growth in value over a prolonged period. Note that the definition of what constitutes military equipment was expanded in 1993 and 2012.

**Figure 2**      **Growth in value for actual exports of military equipment in current prices 1973–2024 (SEK million)**

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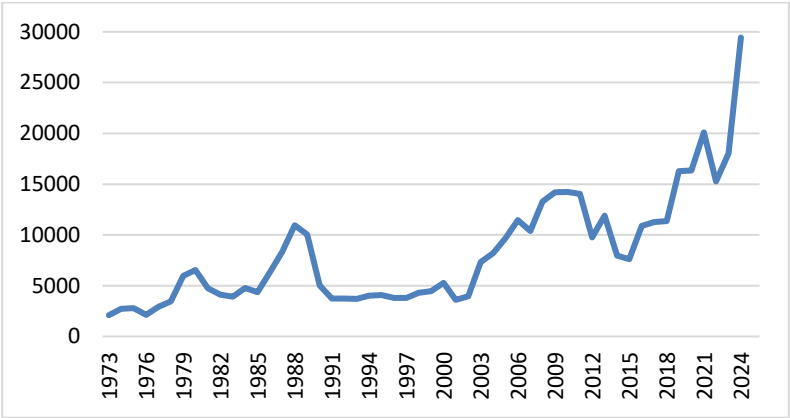


Table 22 shows the value of exports by country over the past three years.

**Table 22**      **The value of actual exports of military equipment by country 2022–2024 (SEK million)**

Country	2022	2023	2024
EU			
Belgium	30	35	71
Bulgaria	2.2	145	254
Denmark	133	209	215
Estonia	222	104	505
Finland	146	303	521
France	292	532	725
Greece	0.7	4.2	3.1
Ireland	117	28	14
Italy	96	137	117
Croatia	1.3	1.8	2.6
Latvia	188	129	273
Lithuania	63	173	446
Luxembourg	0.1	0.2	-
Malta	0.02	-	0.03
The Netherlands	363	329	956
Poland	34	142	1,121
Portugal	4.5	2.1	4.7
Romania	10	5.3	1.8
Slovakia	9.1	25	68
Slovenia	2.8	9.4	1.4

Country	2022	2023	2024
Spain	64	62	90
Czech Republic	720	488	789
Germany	1,322	951	2,066
Hungary	880	946	2,384
Austria	16	17	259
<b>Total</b>	<b>4,718</b>	<b>4,778</b>	<b>10,889</b>
<b>REST OF EUROPE</b>			
Albania	0.1	-	-
Andorra	0.2	1.1	0.6
Iceland	1.0	2.0	2.6
Montenegro	-	-	0.2
Norway	668	634	652
Switzerland	340	326	452
United Kingdom	423	1,507	821
Türkiye	-	4.3	32
Ukraine	4.3	300.1	610
<b>Total</b>	<b>1,436</b>	<b>2,776</b>	<b>2,569</b>
<b>NORTH AMERICA</b>			
Canada	101	261	139
USA	2,554	3,467	4,583
<b>Total</b>	<b>2,655</b>	<b>3,728</b>	<b>4,722</b>
<b>CENTRAL AMERICA</b>			
Mexico	1.8	8.0	23
<b>Total</b>	<b>1.8</b>	<b>8.0</b>	<b>23</b>
<b>SOUTH AMERICA</b>			
Argentina	18	28	-
Brazil	3,033	2,798	2,569
Chile	-	0.6	0.2
Ecuador	0.03	-	-
Peru	7.0	0.02	0.1
Uruguay	0.2	0.1	-
<b>Total</b>	<b>3,059</b>	<b>2,827</b>	<b>2,570</b>
<b>NORTH EAST ASIA</b>			
Japan	165	27	275
South Korea	80	224	163
<b>Total</b>	<b>245</b>	<b>251</b>	<b>438</b>



Country	2022	2023	2024
<b>SOUTH EAST ASIA</b>			
Brunei	0.8	7.1	0.08
Philippines	0.6	-	-
Indonesia	259	1.1	0.4
Malaysia	9.9	2.3	89
Singapore	48	198	90
Thailand	430	312	353
<b>Total</b>	<b>748</b>	<b>520</b>	<b>533</b>
<b>SOUTH ASIA</b>			
India	1,251	704	917
Pakistan	38	1,573	61
<b>Total</b>	<b>1,289</b>	<b>2,277</b>	<b>978</b>
<b>MIDDLE EAST</b>			
UAE	712	219	6,153
Israel <sup>3</sup>	4.7	18	21
Jordan	0.3	-	-
Kuwait	28	0.2	-
Oman	-	0.3	-
Qatar	5.2	2.2	0.09
Saudi Arabia	13	95	71
<b>Total</b>	<b>763</b>	<b>334</b>	<b>6,245</b>
<b>REST OF AFRICA</b>			
Botswana	0.1	0.8	1.1
Namibia	0.5	1.1	0.8
Nigeria	-	0.6	-
South Africa	50	163	185
Tanzania	-	0.2	0.3
Zambia	0.5	0.6	0.7
<b>Total</b>	<b>51</b>	<b>166</b>	<b>188</b>
<b>OCEANIA</b>			
Australia	276	337	258
New Zealand	8.4	14	20

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<sup>3</sup> The exports were follow-on deliveries to private companies of components which, at the time of the original export, did not constitute military equipment. The deliveries in 2024 were made on the basis of export licenses issued in previous years. No export licence has been issued for the sale of military equipment since October 2023.

Country	2022	2023	2024
Total	285	351	278
INTERNATIONAL ORGANISATIONS			
EU	4.2	-	-
UN and other international organisations	-	-	1.8
Total	-	-	1.8
TOTAL	15,254	18,016	29,435

Table 23 shows the value of Swedish exports of military equipment to the top 30 countries in terms of receipts of such equipment since 1993.

**Table 23**      **Value of actual exports of military equipment to the 30 largest recipient countries in current prices 1993–2024 (SEK million)**

Place	Country	Total
1.	USA	34,719
2.	Brazil	26,620
3.	UAE	21,929
4.	Norway	19,654
5.	Germany	16,761
6.	India	15,390
7.	The Netherlands	15,186
8.	Hungary*	13,522
9.	South Africa	13,352
10.	United Kingdom	13,089
11.	Pakistan	12,810
12.	Czech Republic*	12,640
13.	Thailand	12,006
14.	France	11,106
15.	Finland	10,789
16.	Singapore	9,253
17.	Switzerland	8,426
18.	Denmark	7,932
19.	Australia	6,924
20.	Saudi Arabia	5,684
21.	Canada	5,489
22.	South Korea	3,774

Place	Country	Total
23.	Austria	3,413
24.	Italy	2,918
25.	Greece	2,735
26.	Japan	2,443
27.	Estonia	2,200
28.	Poland	2,082
29.	Mexico	1,618
30.	Latvia	1,488

\* Including lease payments

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Table 24 shows the 30 largest recipient countries of Swedish military equipment, divided up by five-year period since 2005.

**Table 24 Value of actual exports of military equipment to the 30 largest recipient countries by period (SEK million)**

Place	2005– 2009	Value	2010– 2014	Value	2015– 2019	Value	2020– 2024	Value
1.	South Africa	8,051	Thailand	7,967	Brazil	12,308	UAE	17,802
2.	The Netherlands	7,037	Saudi Arabia	5 125	Norway	6,431	USA	15,966
3.	Pakistan	4,161	USA	4,881	USA	4,469	Brazil	12,518
4.	USA	4,016	India	4,361	India	3,774	Germany	6,143
5.	Czech Republic*	3,443	United Kingdom	3,741	Hungary*	2,896	Hungary*	6,023
6.	Denmark	3,283	The Netherlands	3,195	Pakistan	2,722	India	3,444
7.	Finland	3,183	Norway	3,022	Czech Republic*	2,688	United Kingdom	3,400
8.	Germany	2,854	Czech Republic*	2,915	Germany	2,529	Czech Republic*	3,335
9.	France	2,749	Pakistan	2,832	The Netherlands	1,913	Norway	2,966
10.	Hungary*	2,431	France	2,481	UAE	1,771	The Netherlands	2,741
11.	Singapore	2,342	South Africa	2,318	United Kingdom	1,629	Pakistan	2,618
12.	India	2,296	Canada	2,050	Finland	1,589	France	2,220
13.	Greece	2,259	Germany	2,016	France	1,526	Thailand	1,934

Place	2005–	Value	2010–	Value	2015–	Value	2020–	Value
	2009		2014		2019		2024	
14.	United Kingdom	2,127	Hungary*	2,001	South Korea	1,476	Switzerland	1,644
15.	Switzerland	1,584	UAE	1,943	Thailand	1,198	Australia	1,600
16.	Norway	1,389	Finland	1,846	Canada	1,171	Finland	1,556
17.	Australia	1,363	Australia	1,639	South Africa	1,008	Poland	1,364
18.	Italy	1,009	Singapore	1,555	Singapore	933	Estonia	1,192
19.	Canada	709	Denmark	1,256	Denmark	874	Latvia	948
20.	South Korea	610	South Korea	761	Austria	760	Ukraine	914
21.	Spain	407	Algeria	738	Australia	696	Denmark	900
22.	Japan	290	Italy	614	Estonia	646	South Korea	891
23.	Malaysia	195	Japan	271	Switzerland	576	Lithuania	816
24.	UAE	182	Estonia	266	Italy	536	Japan	754
25.	Thailand	140	Brazil	253	Türkiye	535	Canada	720
26.	Austria	128	Switzerland	239	Japan	488	Singapore	644
27.	Poland	112	Brunei	221	Poland	422	South Africa	507
28.	Ireland	100	Austria	166	Mexico	321	Italy	493
29.	Mexico	91	Poland	141	Saudi Arabia	236	Austria	463
30.	Saudi Arabia	89	Spain	130	Latvia	219	Bulgaria	406

\* Including lease payments

## Other activity abroad

Alongside exports, there are certain requirements for licences and reporting for further activity abroad.

## Agreements concerning manufacturing rights and cooperation

Entering into agreements involving the granting or transfer of manufacturing rights to parties outside Sweden requires a licence under the Military Equipment Act. In accordance with the same Act, a licence is required to enter into cooperation agreements with parties outside the country to jointly with said parties, or on their behalf, provide technical assistance to parties abroad, develop military equipment or methods for

the manufacture of such material or to jointly manufacture military equipment.

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In 2024, the ISP approved 20 licences for Swedish companies to enter into agreements involving the granting or transfer of manufacturing rights to parties outside Sweden and 58 licences for Swedish companies and government agencies to enter into cooperation agreements with a party outside the country. Table 25 shows the number of licences granted per country to enter into licence agreements and partnership agreements. Note that certain agreements relate to both manufacturing rights and cooperation, and that a single agreement may relate to more than one country. Note also that agreements within the framework of the European Defence Fund (EDIDP) and other forms of EU cooperation are reported separately, as these often involve multiple participating countries.

**Table 25      Number of licences granted to enter into agreements on licence production and cooperation broken down by country in 2024**

Country	Licence agreements	Cooperation agreements
Australia	-	3
Denmark	-	1
Estonia	-	1
EU cooperation: EDF/EDIDP	-	27
EU cooperation: other (EDA)	-	5
Finland	1	2
France	-	3
United Arab Emirates	-	1
Greece	-	1
India	1	-
Italy	-	1
Canada	1	1
The Netherlands	3	1
Norway	2	1
Singapore	1	-
Slovakia	5	1
Spain	-	1
United Kingdom	1	3
Czech Republic	6	-
Germany	1	3
USA	-	5

A party that has obtained a licence to enter into agreements is obliged to submit details to the ISP annually on the validity of these agreements. In 2024, 16 companies and one government agency reported a total of 113 licence production agreements. At the same time, 27 companies and three

government agencies reported a combined total of 246 cooperation agreements.

Table 26 shows all currently valid licence agreements and cooperation agreements broken down by country. Note that certain agreements relate to both manufacturing rights and cooperation, and that a single agreement may relate to more than one country.

**Table 26      Number of reported licence production and cooperation agreements broken down by country in 2024**

Country	Licence agreements	Cooperation agreements
Australia	1	11
Brazil	5	11
Bulgaria	1	-
Denmark	6	-
Estonia	-	5
EU cooperation: EDF/EDIDP	-	56
EU cooperation: other (EDA)	-	14
Finland	5	10
France	4	15
United Arab Emirates	1	3
Greece	1	2
India	5	1
Indonesia	-	1
Italy	-	7
Japan	6	2
Canada	4	12
Latvia	1	-
The Netherlands	11	14
Norway	6	16
New Zealand	-	1
Peru	2	1
Poland	1	3
Romania	1	-
Saudi Arabia	-	2
Switzerland	6	6
Singapore	1	3
Slovakia	8	4
Spain	-	7
United Kingdom	5	29
South Africa	1	2
South Korea	-	2
Czech Republic	21	4

Country	Licence agreements	Cooperation agreements
Germany	2	21
USA	8	25
Austria	-	2

## Ownership abroad

A party holding a manufacturing or supplier licence for military equipment is obliged to provide information to the ISP on ownership in foreign legal entities undertaking development, manufacturing, marketing or sale of military equipment, or which provide technical assistance.

In 2024, 15 companies reported ownership in 86 foreign legal entities in a total of 33 countries. Table 27 shows the number of foreign legal entities broken down by the countries in which they operate.

**Table 27**      **Number of reported foreign legal entities broken down by country in 2024**

Country	Number of Swedish-owned legal entities
Australia	2
Belgium	1
Brazil	2
Chile	1
Colombia	1
Denmark	3
Finland	3
France	4
United Arab Emirates	2
India	6
Italy	2
Canada	1
Kenya	1
Latvia	1
Malaysia	3
Mauritius	1
The Netherlands	5
Norway	5
Pakistan	1
Poland	1
Saudi Arabia	1
Switzerland	3
Singapore	2
Spain	1

Country	Number of Swedish-owned legal entities
United Kingdom	6
South Africa	2
South Korea	1
Thailand	2
Czech Republic	2
Germany	9
Hungary	1
USA	7
Austria	3
<b>Total</b>	<b>86</b>

**Military training**

The Swedish Military Equipment Act stipulates that military training of foreign nationals may not be conducted in or outside Sweden without permission from the ISP. This prohibition does not apply to training provided by government agencies or training associated with sales of military equipment for which export licences have been granted. No licences for military training were granted in 2024.

**Further transfer of military equipment**

As a rule, military equipment that has been exported from Sweden is subject to the end-use obligations that the purchaser, by signing an end-user certificate, is bound by. In the event that a previous purchaser wishes to transfer such military equipment to another party, consent is required from the ISP, which can then release the purchaser from its end-user obligations. Approval of such further transfer is conditional on it being possible for an end-user certificate from the new user to be shown. Table 28 shows the licences issued in 2024 for further transfer of equipment originally supplied from Sweden. Note that further transfer within the country and further transfer back to Sweden also require a licence.

**Table 28      Approved further transfer of military equipment in 2024  
broken down by country and type of equipment**

From	To	Number	Categories of equipment
Belgium	Belgium	2	ML8/MEC
Finland	Switzerland	1	ML6/OME
France	France	1	ML8/MEC
France	Switzerland	2	ML8/MEC
Lithuania	Lithuania	1	ML1/MEC
Norway	Poland	1	ML8/MEC



Norway	Germany	2	ML3/MEC
New Zealand	Spain	1	ML17/OME
Singapore	Singapore	1	ML5/OME
United Kingdom	Ireland	4	ML1/OME, ML3/OME
United Kingdom	Norway	1	ML8/MEC
United Kingdom	United Kingdom	7	ML8/MEC
United Kingdom	Sweden	1	ML5/MEC
Germany	Australia	1	ML21/OME
Germany	Switzerland	1	ML8/MEC
USA	Moldova	1	ML2/MEC
	Ukraine <sup>4</sup>	19	ML1/MEC, ML1/OME, ML2/MEC, ML2/OME, ML3/MEC, ML3/OME, ML4/MEC, ML4/OME, ML5/MEC, ML6/MEC, ML6/OME, ML11/OME, ML14/OME, ML21/OME, ML22/OME
USA	USA	1	ML17/OME
<b>Total</b>		<b>49</b>	

<sup>5</sup> Due to foreign affairs secrecy rules, the country of origin is not stated in respect of the transfer of military equipment to Ukraine.

### Individual suppliance

Swedish authorities, Swedish companies and anyone resident or permanently domiciled in Sweden intending to supply military equipment that is located abroad to another party abroad must, in the individual case, hold a licence from the ISP, known as an individual suppliance licence. Licences are required irrespective of whether the military equipment belongs to the applicant or to another party. Table 29 shows the licences issued in 2024 for supplying military equipment between two parties abroad.

**Table 29**      **Individual suppliance licences granted in 2024 broken down by country and category of equipment**

From	To	Number of approvals	Categories of equipment
Belgium	Estonia	1	ML6/OME, ML17/OME
Brazil	Brazil	1	ML10/OME
Denmark	France	1	ML4/OME

From	To	Number of approvals	Categories of equipment
Denmark	United Kingdom	1	ML4/OME
Estonia	Denmark	3	ML6/OME
Estonia	Estonia	1	ML6/OME
Estonia	France	1	ML6/OME
Estonia	The Netherlands	2	ML6/OME
Estonia	Poland	2	ML6/OME
Estonia	Germany	1	ML6/OME
France	Denmark	3	ML6/OME
Finland	Finland	2	ML2/OME, ML9/OME
France	France	3	ML6/OME
France	Latvia	1	ML5/OME
France	The Netherlands	3	ML6/OME
France	Norway	2	ML4/OME, ML11/OME
France	Poland	1	ML4/OME
France	Germany	2	ML4/MEC, ML4/OME
France	USA	1	ML4/MEC
UAE	UAE	1	ML15/OME
Israel	Brazil	1	ML5/MEC, ML5/OME, ML11/OME, ML15/OME, ML18/OME
Israel	Finland	1	ML5/OME, ML21/OME
Italy	Estonia	1	ML6/OME
Latvia	India	2	ML17/OME
Latvia	Ireland	1	ML17/OME
Latvia	Croatia	1	ML17/OME
Latvia	Latvia	1	ML17/OME
Latvia	USA	2	ML17/OME
The Netherlands	Denmark	5	ML6/OME
The Netherlands	The Netherlands	6	ML1/OME, ML2/MEC, ML2/OME, ML6/OME, ML13/OME
The Netherlands	Poland	2	ML6/OME
The Netherlands	Germany	2	ML4/MEC, ML6/OME
Norway	Estonia	1	ML1/OME
Norway	USA	1	ML1/MEC, ML1/OME
Poland	Poland	1	ML11/OME
Switzerland	Switzerland	1	ML6/MEC
Spain	Estonia	1	ML6/OME

From	To	Number of approvals	Categories of equipment
United Kingdom	Finland	4	ML4/MEC, ML4/OME, ML5/MEC, ML9/MEC
United Kingdom	United Kingdom	4	ML4/MEC, ML4/OME, ML5/OME
South Africa	Poland	1	ML11/OME
Czech Republic	Moldova	1	ML3/MEC
Czech Republic	Poland	1	ML14/OME
Germany	Bulgaria	1	ML4/OME
Germany	Denmark	2	ML6/OME
Germany	Finland	1	ML4/OME
Germany	Norway	1	ML4/OME
Germany	Poland	1	ML4/MEC
Germany	Switzerland	1	ML4/OME
Germany	Germany	1	ML6/OME
Germany	USA	1	ML4/MEC
USA	Brazil	1	ML18/OME, ML21/OME
USA	USA	2	ML10/OME, ML18/OME
Austria	Luxembourg	1	ML6/OME
<b>Total</b>		<b>87</b>	

Table 30 shows the value of military equipment supplied by Swedish government agencies, Swedish companies and persons resident or permanently domiciled in Sweden that have supplied military equipment which is located abroad to another party abroad. Together with the actual exports from Sweden, this give a comprehensive picture of Swedish military equipment sales.

**Table 30**      **Value of actual deliveries of military equipment based on individual suppliance licences in 2024 broken down by country and category of equipment (SEK)**

From	To	Categories of equipment	Value
Estonia	Denmark	ML6/OME	196,758
Estonia	Estonia	ML6/OME	62,024,352
Estonia	France	ML6/OME	43,724
Estonia	The Netherlands	ML6/OME	3,238,794
Estonia	Poland	ML6/OME	852,618
Estonia	Germany	ML6/OME	2,459,475
France	France	ML6/OME	11,000,000

From	To	Categories of equipment	Value
France	Japan	ML2/OME	864,000
France	The Netherlands	ML6/OME	253,004,022
France	Norway	ML4/OME	8,236,125
France	Norway	ML11/OME	532,200
Latvia	Denmark	ML17/OME	153,625
Latvia	India	ML17/OME	5,952,343
Latvia	Ireland	ML17/OME	45,080
Latvia	The Netherlands	ML17/OME	3,914,416
Latvia	USA	ML17/OME	222,900
The Netherlands	Denmark	ML6/OME	27,015,000
The Netherlands	The Netherlands	ML6/OME	602,703,339
The Netherlands	Poland	ML6/OME	114,639,825
The Netherlands	Germany	ML6/OME	300,000,000
Norway	Estonia	ML1/OME	3,866,400
Switzerland	Switzerland	ML6/MEC	959,659,800
United Kingdom	Finland	ML9/OME	44,885
United Kingdom	The Netherlands	ML6/OME	1,904,000
United Kingdom	United Kingdom	ML4/OME	7,973,921
United Kingdom	United Kingdom	ML17/OME	107,531
Czech Republic	Poland	ML14/OME	12,565,133
Germany	Denmark	ML6/OME	24,000,000
Germany	The Netherlands	ML6/OME	5,633,209
Germany	Germany	ML6/OME	282,987,330
USA	Norway	ML1/MEC	410,601
USA	Norway	ML1/OME	305,541
Austria	Ireland	ML6/OME	8,100,000
Austria	Luxembourg	ML6/OME	8,880,000
<b>Total</b>			<b>2,445,867,385</b>

Civil firearms

Licences from the ISP are required for exports of civil firearms (hunting and sport shooting weapons), parts for firearms and ammunition for these weapons outside the EU. The assessment of exports of civilian firearms to non-EU countries is carried out both under Council Regulation (EU) No 258/2012 implementing Article 10 of the UN Protocol on the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition and under the War Material Act (1992:1300). This does not, however, apply to exports of smooth-bore shotguns and parts and ammunition for such weapons, and assessment therefore only takes place according to the EU Regulation mentioned.

Table 31 shows the number of applications according to Regulation (EU) No 258/2012 received by the ISP per year in the past five years.

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**Table 31      Number of applications concerning exports of civilian firearms 2020–2024**

	2020	2021	2022	2023	2024
Export applications	213	236	211	245	234

Table 32 shows the number of licences granted per country under the same Regulation. As a large proportion of the licences issued under the Regulation relate to own use, gifts and loans, no value is presented in this table.

**Table 32      Number of licences granted concerning exports of civilian firearms 2022–2024 per country**

Destination	2022	2023	2024
<b>EUROPE</b>			
Andorra	3	2	1
Faroe Islands	2	-	-
Iceland	3	3	4
North Macedonia	-	-	1
Norway	110	130	107
Switzerland	18	15	20
Serbia	-	-	1
United Kingdom	10	11	21
Ukraine	1	-	-
<b>Total</b>	<b>147</b>	<b>161</b>	<b>155</b>
<b>NORTH AMERICA</b>			
Canada	2	10	7
USA	18	25	28
<b>Total</b>	<b>20</b>	<b>35</b>	<b>35</b>
<b>SOUTH AMERICA</b>			
Chile	1	1	2
Peru	2	-	1
Uruguay	2	-	-
<b>Total</b>	<b>5</b>	<b>1</b>	<b>3</b>
<b>NORTH EAST ASIA</b>			
Japan	4	4	1

Destination	2022	2023	2024
Total	4	4	1
MIDDLE EAST			
UAE	-	-	1
Lebanon	-	1	-
Total	-	1	1
REST OF AFRICA			
Botswana	-	2	3
Namibia	1	3	1
South Africa	7	11	15
Tanzania	-	1	2
Zambia	3	1	2
Total	11	18	23
OCEANIA			
Australia	3	7	7
New Zealand	4	5	3
Total	7	12	10
TOTAL	194	232	228

Transfers within the EU

As a rule, there is free movement of dual-use items within the EU. A licence for the transfer of dual-use items to another EU Member State is required only to a very limited extent pursuant to Annex IV of the 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 (recast). Assuming that exports of dual-use items follow the same geographical distribution as total exports of goods, this means that more than half of the exports of dual-use items from Sweden can take place without a licence, since they would be to other EU Member States.

Table 33 shows the number of applications for transfer licences to other EU Member States during 2024, divided up by granted and denied applications for licences.

**Table 33      Number of processed applications for transfer licences to another EU Member State in 2024**

Granted	Denials	Total
43*	0	43

\*All granted applications relate to the SSM.

Exports supported by the general licence to Australia, Canada, Japan, Liechtenstein, Norway, New Zealand, Switzerland, the United Kingdom and the United States.

Just over one quarter of Sweden’s total exports of goods in 2024 went to Australia, Canada, Japan, Liechtenstein, Norway, New Zealand, Switzerland, the United Kingdom and the United States. There is an EU general licence, which is very extensive in terms of the number of items, for exporting dual-use items to these countries (EU001). A Swedish exporter wishing to export dual-use items under the general licence is required only to make a one-off notification at the time when the licence is first used. An individual or global licence for export to any of the countries mentioned is only required in a few cases.

Table 34 shows the number of exporters that notified use of the general licence EU001 during 2024 and the total number of notifications since this general licence was introduced in 2009.

**Table 34**      **Number of notifications of the use of the general licence EU001**

Licences	Notifications in 2024	Notifications since introduction in 2009
EU001	35	348

### Exports under other general licences

There are seven EU general licences, which are not particularly extensive in terms of the number of items they cover, for the export of dual-use items to certain other countries in the world, known as EU002–EU008. An exporter in Sweden wishing to export dual-use items under any of the five general licences EU002–EU006 is only required to make a one-off notification at the time the licence is first used.

Table 35 shows the number of exporters that notified use of the general licences EU002–EU006 during 2024 and the total number of notifications since the introduction of the licences. The licences were introduced in November 2011, which is why the total number starts from 2012.

**Table 3265**      **Number of notifications of the use of the general licences EU002–EU006**

Licences	Notifications in 2024	Notifications since introduction in 2012
EU002	1	10
EU003	1	15
EU004	0	9
EU005	3	5
EU006	0	1

The Dual-Use Regulation has added two EU general licences in the form of EU007 and EU008. Exports under these two general licences are subject to the condition that the exporter has registered with and notified the ISP before the first export that it intends to make use of the licence.

Table 36 shows the number of exporters who have registered with and notified the Inspectorate prior to using the EU general licences EU007 and EU008 during 2024, and the total number of notifications since their introduction.

**Table 36**      **Number of notifications of the use of the EU general licences EU007 and EU008**

Licences	Registrations and notifications in 2024	Registrations and notifications since their introduction in 2021
EU007	0	5
EU008	1	6



In the event that none of the general licences are applicable, either a global or an individual export licence is required for the export of dual-use items outside the EU.

Tables 37 and 38 show the number of decisions on applications for export licences relating to dual-use items, broken down into granted and denied applications for licences. The tables cover applications for both global and individual export licences.

Table 37 shows the number of decisions on applications for export licences concerning dual-use items listed in Annex I to the Dual-Use Regulation. The table reports licences divided up by the control regime under which the item in question is controlled. The control regimes are the Australia Group (AG), the Missile Technology Control Regime (MTCR), the Nuclear Suppliers Group (NSG) and the Wassenaar Arrangement (WA).

**Table 37      The number of granted and denied applications for export licences in 2024 concerning dual-use items, broken down by control regime**

Control regime	Granted	Denials
Australia Group (AG)	235	4
Missile Technology Control Regime (MTCR)	12	0
Nuclear Suppliers Group (NSG)	215*	3
The Wassenaar Arrangement (WA)	387	26
<b>Total</b>	<b>849</b>	<b>33</b>

\*94 applications were granted by the ISP and 121 by the SSM.

Table 38 shows applications for export licences concerning items not covered by controls through application of Article 4 of the Dual-Use Regulation (the general clause, which is also known as the ‘catch-all’ clause). The application of this clause means that items not listed in Annex 1 to the Dual-Use Regulation are covered by the licence requirement following a decision by the ISP in the individual case. Decisions on licence requirements under the catch-all clause may cover items that are or may be wholly or partially intended for biological and chemical weapons and for nuclear weapons or missiles capable of carrying such weapons.

The licence requirement may also cover items intended for a military end-use in countries covered by a weapons embargo, or items that are or may be intended to be used as components for military equipment that has been exported from the EU without a licence or in contravention of a licence.

**Table 38**      **Number of granted and denied applications for export licences in 2024 concerning dual-use items covered by licence requirements under Article 4 (catch-all clause) of the Dual-Use Regulation**

Granted	Denials	Total
9	1	10

Table 39                      Number of granted and denied applications for export licences in 2022 under Council Regulation 267/2012 concerning restrictive measures against Iran According to the Regulation, more items are covered by licence requirements than on export to other countries. For this reason, the applications are presented separately in this table, and are thus not included in the material for other tables.

**Table 39**      **Number of granted and denied applications for export licences in 2024 under Council Regulation 267/2012 concerning restrictive measures against Iran**

Granted	Denials	Total
144	0	144

Table 40 shows the number of applications granted and denied under Council Regulation No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine. The table covers dual-use items and/or items listed in Annex VII to Regulation No 833/2014, as well as the provision of technical assistance or other services related to them. The restrictive measures cover, among other things, dual-use items which are also subject to licence requirements under the Dual-Use Regulation. In cases where a licence is also required under the Dual-Use Regulation, only the ISP’s decisions to grant and deny applications are presented in this table.

**Table 40**      **Number of applications granted and denied in 2024 under Regulation No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine**

Granted	Denials	Total
4	4	8

Table 41 shows the number of applications received to exercise the option of an exemption from prohibitions on exports or on the provision of technical assistance pursuant to Article 2(3) and Article 2a(3) of Council Regulation No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine. The applications cover exemptions from the prohibition on exports of, or the provision of

**Table 41**      **Number of applications received concerning exemptions from prohibitions on exports or on the provision of technical assistance in 2024 pursuant to Council Regulation No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine**

Applications in 2024
3

Table 42 shows the number of granted applications for export licences broken down into nine item categories in Annex 1 to the Dual-Use Regulation. Annex I also covers category 0, which concerns nuclear materials, facilities and equipment. Applications for export licences regarding category 0 are reported by the Swedish Radiation Safety Authority (SSM).

**Table 42**      **Number of export licences granted in 2024 concerning dual-use items broken down by item category and by individual and global export licences**

Categories 1–9 in Annex I	Individual export licences	Global export licences	Total
Category 1 <i>Special materials and related equipment</i>	77	2	79
Category 2 <i>Materials processing</i>	241	6	247
Category 3 <i>Electronics</i>	104	6	110
Category 4 <i>Computers</i>	1	3	4
Category 5 <i>Telecommunications and information security</i>	180	47	227
Category 6 <i>Sensors and lasers</i>	46	5	51
Category 7 <i>Navigation and avionics</i>	2	7	9
Category 8 <i>Naval</i>	2	0	2
Category 9 <i>Aerospace and propulsion</i>	5	3	8

Table 43 shows the number of licences granted per country in 2024. The table only includes individual and global licences. As a general rule, these licences are not required for transfers to countries within the EU or for exports to Australia, Canada, Japan, Liechtenstein, Norway, New Zealand, Switzerland, the United Kingdom and the United States.

**Table 43      Countries covered by the greatest number of granted export licences for dual-use items in 2024**

Country	Number of licences
China	144
India	84
South Korea	72
Singapore	64
Taiwan	63
South Africa	57
Brazil	56
Israel	53
Malaysia	45
Mexico	45
Thailand	42
Indonesia	38
United Arab Emirates	36
Ukraine	36
Chile	34
Türkiye	34
Qatar	32
Argentina	30
Egypt	28
Philippines	28

Table 44 shows the number of denied applications for individual and global licences in 2024 per country.

**Table 44      Countries with the greatest number of licence denials concerning dual-use items in 2024**

Country	Number of licences denied
China	10
Haiti	8
India	5
Kazakhstan	5
Egypt	4
Armenia	3

Country	Number of licences denied
Central African Republic	3
Kyrgyzstan	3
Russia	3
El Salvador	2
United Arab Emirates	2
Guatemala	2
Indonesia	2
Malaysia	2
Myanmar	2

## Individual and global export licences for dual-use items with a military end-user

Tables 45 and 46 show granted and denied applications for export licences for dual-use items with military end-users. These licences are broken down into global and individual export licences, and are reported per country and final use.

**Table 45**      **Number of granted export licences concerning dual-use items for military end-users in 2024**

Country	Global export licences	Individual export licences	Final use
Brazil	1	-	Software
Egypt*	-	2	Area protection
United Arab Emirates	1	2	For use in electronic systems
India	1	2	Telecommunications, for naval use
Indonesia	1	-	Software
Israel*	-	1	Area protection
Japan	1	-	Space
Jordan	-	1	Area protection
Canada	1	-	Space
Kuwait	2	-	Telecommunications
Malaysia	1	4	Software, telecommunications, coast guard
Pakistan	1	-	For use in electronic systems
Peru	-	1	Software
Qatar	1	1	Software, border guard

Saudi Arabia	1	- For use in electronic systems
Singapore	1	6 Telecommunications, software
United Kingdom	-	5 Software, for naval use
Thailand	-	2 Protective equipment
Tunisia	-	2 Software
Türkiye	1	- Software
Ukraine	-	4 Software, telecommunications
USA	1	- Space
<b>Total</b>	<b>15</b>	<b>33</b>

\*The licence is for export to a peacekeeping operation.

**Table 46**      **Number of denied applications for export licences concerning dual-use items for military end-users in 2024**

Country	Denials of global export licences	Denials	Final use
		individual export licences	
India	-	1	For analysis
Serbia	-	2	For analysis, compound protection
Thailand	-	1	Border and coast guard
<b>Total</b>	-	<b>4</b>	

### Advance rulings concerning exports of dual-use items and provision of technical assistance

The reporting of resolved requests for advance rulings is broken down into three main categories. The first category concerns the number of requests for advance rulings concerning dual-use items listed in Annex I to the Dual-Use Regulation. These items are always subject to export controls. The second category concerns the number of requests for advance rulings for exports of dual-use items not listed in the Annex. The third category concerns the number of requests for advance rulings concerning the provision of technical assistance for dual-use items.

Table 47 shows the number of resolved requests for advance rulings concerning controlled items in Annex I to the Dual-Use Regulation, broken down into positive and negative advance rulings. A positive advance ruling means that the ISP has issued a notification that a licence can be expected to be granted following assessment of an application for an export licence. A negative advance ruling means that the ISP has issued a notification that a licence cannot be expected to be granted following assessment of an application for an export licence. The decisions are non-binding and are issued on the basis of the circumstances prevailing at the

**Table 47      Number of positive and negative advance rulings issued in 2024 concerning exports of controlled items in Annex I to the Dual-Use Regulation**

Positive advance rulings	Negative advance rulings	Total
27	18	45

Table 48 presents the rulings on requests where an advance ruling has been made as to whether a licence is required pursuant to Article 4 of the Dual-Use Regulation for dual-use items not listed in Annex I to that Regulation (the catch-all clause). The requests are broken down into the following categories: ‘decision on licence requirement for exports and positive advance ruling’, ‘decision on licence requirements for exports and negative advance ruling’ and ‘decision that an export licence is not required’.

The category ‘decision on licence requirement for exports and positive advance ruling’ means that the ISP has made a decision that the items included in the request are covered by a licence requirement pursuant to Article 4 of the Dual-Use Regulation, and that the Inspectorate has issued a positive advance ruling.

The category ‘decision on licence requirement for exports and negative advance ruling’ means that the ISP has made a decision that the items included in the request are covered by a licence requirement pursuant to Article 4 of the Dual-Use Regulation, and that the Inspectorate has issued a negative advance ruling.

The category ‘decision that an export licence is not required’ means that the ISP has made a decision that the items included in the request are not covered by a licence requirement pursuant to Article 4 of the Dual-Use Regulation.

**Table 48 Number of rulings on requests made in 2024 concerning a licence requirement for exports of dual-use items pursuant to Article 4 (catch-all clause) of the Dual-Use Regulation**

Country	Decisions on licence requirements for exports – positive advance ruling	Decisions on licence requirements for exports – negative advance ruling	Decisions that an export licence is not required	Total
United Arab Emirates	-	2	-	2
India	-	2	1	3
China	-	1	4	5
Pakistan	-	1	1	2

United Kingdom	2	-	-	2
South Africa	-	-	1	1
Vietnam	-	-	1	1
<b>Total</b>	<b>2</b>	<b>6</b>	<b>8</b>	<b>16</b>

**Table 49 27 Licences for exports, or for transfers within the EU, granted for dual-use items, belonging to Category 0 in Annex 1 to the Dual-Use Regulation, from companies in Sweden (source: SSM)**

Recipient country	Number of global licences	Number of individual licences	Item categories
Argentina	0	1	0A001j
Belgium	2*	0	0D001, 0E001
Brazil	2	1	0A001f, 0C001, 0C002, 0D001, 0D001, 0E001
Bulgaria	2*	0	0D001, 0E001
Denmark	2*	0	0E001
Finland	4*	2	0A001h, 0D001, 0E001
France	9*	1	0A001g, 0D001, 0E001
Italy	1*	0	0D001, 0E001
Japan	3	6	0A001d, 0A001f, 0A001h, 0C002, 0D001, 0E001
Canada	2	1	0B005, 0D001, 0E001
Croatia	1*	0	0E001
Lithuania	1*	0	0E001
The Netherlands	2*	0	0E001
Norway	2	4	0C001, 0D001, 0E001
Switzerland	2	2	0A001f, 0A001h, 0A001j, 0C001, 0C002, 0D001, 0E001
Slovakia	2*	1	0A001d, 0A001f, 0A001h, 0B005, 0D001, 0E001
Slovenia	1*	0	0D001, 0E001
Spain	4*	10	0A001d, 0A001f, 0A001h, 0D001, 0E001
United Kingdom	3	3	0A001f, 0A001h, 0D001, 0E001
South Africa	1	0	0D001, 0E001
Czech Republic	2*	0	0D001, 0E001
Germany	12*	2	0A001d, 0A001f, 0A001h, 0D001, 0E001



Recipient country	Number of global licences	Number of individual licences	Item categories
USA	11	14	0A001d, 0A001f, 0A001h, 0B005, 0C001, 0C002, 0D001, 0E001

\* of which one or more in the context of a licence with more than one recipient country

Table 50 sets out rulings on requests as to whether a licence is required under Article 8 of the Dual-Use Regulation for the provision of technical assistance to dual-use items. The requests may concern both items listed in Annex I to the Dual-Use Regulation and items not listed in the Annex. A licence for the provision of technical assistance is required where the items in question are, or may be, intended for one of the uses referred to in Article 4.

**Table 50 number of requests made in 2024 for licence requirements for the provision of technical assistance under Article 8 of the Dual-Use Regulation**

Country	Decisions on licence requirements for provision of technical assistance – positive advance ruling	Decisions on licence requirements for provision of technical assistance – negative advance ruling	Decisions concerning removal of the case and/or that a licence for provision of technical assistance is not required	Total
Iran	-	-	2	2
Total	-	-	2	2

**Table 51 Membership of multilateral export control regimes in 2024**

Country	ZC	NSG	AG	MTCR	WA
Argentina	x	x	x	x	x
Australia	x	x	x	x	x
Belarus	x	x	-	-	-
Belgium	x	x	x	x	x
Brazil	-	x	-	x	-
Bulgaria	x	x	x	x	x
Cyprus	-	x	x	-	-
Denmark	x	x	x	x	x
Estonia	-	x	x	-	x
EU	-	-	x	-	-
Finland	x	x	x	x	x
France	x	x	x	x	x

Country	ZC	NSG	AG	MTCR	WA
Greece	X	X	X	X	X
India	-	-	X	X	X
Ireland	X	X	X	X	X
Iceland	-	X	X	X	-
Italy	X	X	X	X	X
Japan	X	X	X	X	X
Canada	X	X	X	X	X
Kazakhstan	X	X	-	-	-
China	X	X	-	-	-
Croatia	X	X	X	-	X
Latvia	-	X	X	-	X
Lithuania	-	X	X	-	X
Luxembourg	X	X	X	X	X
Malta	-	X	X	-	X
Mexico	-	X	X	-	X
The Netherlands	X	X	X	X	X
Norway	X	X	X	X	X
New Zealand	X	X	X	X	X
Poland	X	X	X	X	X
Portugal	X	X	X	X	X
Romania	X	X	X	-	X
Russia	X	X	-	X	X
Switzerland	X	X	X	X	X
Serbia	-	X	-	-	-
Slovakia	X	X	X	-	X
Slovenia	X	X	X	-	X
Spain	X	X	X	X	X
United Kingdom	X	X	X	X	X
Sweden	X	X	X	X	X
South Africa	X	X	-	X	X
South Korea	X	X	X	X	X
Czech Republic	X	X	X	X	X
Türkiye	X	X	X	X	X
Germany	X	X	X	X	X
Ukraine	X	X	X	X	X
Hungary	X	X	X	X	X
United States	X	X	X	X	X
Austria	X	X	X	X	X
<b>TOTAL</b>	<b>39</b>	<b>48</b>	<b>43</b>	<b>35</b>	<b>42</b>

# The Inspectorate of Strategic Products on important trends within Swedish and international export controls

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Bilaga 3

## Developments internationally and their impact on export controls

Russia's full-scale war of aggression against Ukraine continued in 2024 and the build-up of military forces occurring in the world, combined with Sweden's increased participation in international defence cooperation, led to a continued big increase in military equipment cases.

In 2023, the Government decided to appoint an inquiry chair to review the guidelines for export and other foreign cooperation in the field of military equipment, in light of a Swedish membership of NATO. The report on this Inquiry, *A modern, adapted regulatory framework for military equipment*, was presented on 30 November 2024. The Inquiry's report has been referred for consultation.

On 1 December 2023, Sweden introduced a system for screening foreign direct investments in light of Swedish security interests. The Government appointed the ISP as the responsible authority. The screening system supplements export controls in several ways.

The European Economic Security Strategy was presented on 20 June 2023. It is based on the principles of protecting, promoting and partnering with countries that share the EU's concerns or interests on economic security. Both export control and the screening of foreign direct investment are important pillars of the EU's Strategy. The Strategy proposes measures to further strengthen this protection. These include exploring the possibility of introducing a screening system for outbound investment in certain activities from EU Member States to non-EU countries that is deemed to be in need of special protection.

Research security is another important part of the EU's Strategy. National initiatives have also been taken to strengthen efforts with research security. In 2024, three Swedish government agencies reported on their remit to promote responsible internationalisation, which includes research security at Swedish higher education institutions, research funding bodies, and other relevant actors. Their reports have been referred for consultation. The European Economic Security Strategy also includes a White Paper on Enhancing R&D Support Involving Technologies with Dual-Use Potential.

An unsettled international environment and a deteriorating national security situation have meant that export controls have gained an increasingly important role in preventing the proliferation of components and technologies that are essentially civilian but can be used in a military context. In the context of the far-reaching sanctions that the EU has imposed against Russia, export controls in the form of trade restrictions have been an important part of trying to prevent the Russian defence industry from supplying the Russian military with military equipment. The task of preventing the leakage of strategic products to Russia permeates

## **International sanctions against Russia**

As a result of Russia's full-scale invasion of Ukraine, since February 2022 and together with partner countries, the EU has introduced a series of far-reaching packages of sanctions against Russia. The sanctions include a prohibition on the export of certain dual-use items to Russia or for use in Russia. The prohibition also covers a large number of closely related items that could contribute to military and technical enhancements in Russia, or to the development of the Russian defence and security sector. Only very limited possibilities for exemptions from these prohibitions on exports exist. The Government has appointed the ISP as the competent authority for the aforementioned sanctions.

The extensive trade-related sanctions imposed in stages on Russia by the EU and its partner countries are an important part of the political and economic pressure being maintained against Russia. The export restrictions on dual-use items and items that can contribute to technical enhancements of the defence and security sectors represent a significant measure which aims to limit and weaken the Russian armed forces.

## **Military support to Ukraine**

In the period 2022–2024 and following approval from the Riksdag, the Government decided to provide considerable military support to Ukraine. Most of this support has required a licence from ISP under the Military Equipment Act. In total in 2024, the ISP granted 52 export licences concerning donations of military equipment from Sweden to Ukraine.

Furthermore, the ISP granted 30 export licences for direct sales of military equipment from the Swedish defence industry to Ukraine during 2024. In addition, in 19 cases during the year the ISP has granted other countries that hold military equipment manufactured in Sweden the right to donate the equipment to Ukraine.

For the most part, Swedish military support and the transfers concerned ground combat and air defence systems.

## **The scope of export controls in Sweden**

The ISP controls an estimated 3–4% of Sweden's total foreign trade in goods through its assessments of licence applications. Export controls cover goods and technology that it may be sensitive to export or otherwise transfer abroad for defence, security or foreign policy reasons. Around 1% relates to exports of military equipment, while the largest share – about 2–3% – consists of exports of dual-use items. In addition, the ISP controls sales of military equipment manufactured within the country to Swedish government agencies through its assessment of licence applications.

Swedish industry is advanced and often at the forefront of technology in the defence industry, which develops, manufactures and sells military

equipment; and in the industry that develops, manufactures and sells items and technologies covered by the dual-use items regulatory framework. Dual-use items and technology produced by this industry are highly sought after, not only for civilian use but also for military use.

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## General information about the purpose of and trends in Swedish and international export controls

### **The purpose of export controls**

The principal and overriding purpose of export controls is often expressed as a country not wanting an item or a technology to be proliferated to undesirable recipients. An undesirable recipient may be both an end-user country and, for example, a terrorist organisation. Another important purpose of export controls is that a country – particularly during times of crisis – does not want to export items that it would then suffer, or risk suffering, shortages of; and items that the country has a great need to keep in the country or to transfer to allies or close partner countries.

In simple terms, in the ISP's assessment, there are two main reasons why a country that manufactures military equipment or dual-use items does not want that equipment or items to be proliferated to undesirable recipients. The first is that the exports would pose a threat to the security of the exporting country, or its allied or partner countries. The second is that the exports would be contrary to the principles and objectives of the exporting country's foreign policy.

### **The trend in export controls –rearmament and internationalisation**

In recent years, developments in the world at large have led to many countries in the world heavily rearming their armed forces. The world's total military expenditure now corresponds to the level that existed during the Cold War.

During 2024, the Swedish defence industry received extensive orders, from within Sweden as well as from countries abroad. In 2024, the ISP granted export licences to a value of just over SEK 50 billion. In view of the considerable rearmament occurring in the world, and the amount of military equipment manufactured in Sweden that Sweden and other countries have donated to Ukraine and which will be replaced by those countries, the ISP estimates that orders received by the Swedish defence industry will continue to rise during 2025.

This general build-up of military forces in the world has increased the importance of export controls internationally. The great powers want to prevent each other, or other countries, from attaining the same level of rearmament that they have themselves, and export controls are a means used to do this. In view of our high-tech industry, Sweden is also very much affected by this.

The rearmament is placing great demands on export controls. To a large extent, it is the combination of the rearmament and the internationalisation of both the Swedish and foreign defence industries as well as the rapid development of emerging technologies including AI and quantum technology, which is leading to heavy demands being made on export controls. These requirements go far beyond the traditional task of export controls in assessing the suitability of a particular kind of military equipment or a dual-use item reaching a particular recipient or end-user.

Over the past two decades, more than half of the military equipment manufactured in Sweden has been exported. In addition, the Swedish defence industry and dual-use item industry have located a large part of their research and development abroad during this period. This inevitably entails risks of technology regarded as sensitive in terms of the defence capabilities of Sweden, its allies and close partner countries being proliferated in a way previously unimaginable. Business arrangements where a country with which the Swedish defence industry cooperates with, or in which it conducts research and development, wants to sell a military equipment system containing Swedish technology to an undesirable recipient for Sweden, are becoming increasingly common.

During the year, the ISP laid great emphasis in the areas of both military equipment and dual-use items on assessing advanced contract arrangements where counter-purchase requirements from a purchasing country may lead to permanent technology transfer, which in turn poses a risk of leading to undesirable technology transfer to third countries.

### **International agreements on export controls and third-country exports**

The closer the European defence industry is interlinked through partnerships, mergers and acquisitions, the greater the challenge becomes when one country says no to a third-country transaction where their defence industry acts as subcontractor to a partner country with system responsibility in relation to the end-user.

With the aim of avoiding – or in any case mitigating – tensions arising from such scenarios, Germany and France entered into an agreement at the end of 2019 that includes a *de minimis* rule. This rule means that, provided that a subcontractor country that accounts for less than 20% of the content of an item that is assembled in the country that manufactures the system, the country will not stop the item's export to a third country unless there are strong national security reasons for doing so. In 2022, Spain acceded to this international agreement between France and Germany. The Inquiry titled *A modern, adapted regulatory framework for military equipment* proposes that Sweden should accede to this agreement.

### The Military Equipment Act

The Military Equipment Act (1992:1300) applies both to equipment designed for military use and that constitutes military equipment under government regulations and to technical support regarding such military equipment. In the Ordinance (1992:1303) on Military Equipment, the Government specified in more detail what is covered by the provisions of the Act. What constitutes military equipment under the Ordinance coincides with the EU's Joint Military List, with three national supplements. In addition, a distinction between military equipment for combat purposes and other military equipment is made. Military equipment for combat purposes means equipment with a destructive impact including sights for such equipment and fire control equipment. Certain parts and components for military equipment for combat purposes, as well as equipment that does not have a directly destructive impact in a combat situation are counted as other military equipment.

Under the Military Equipment Act, there are general prohibitions on the manufacture, supply and export of military equipment and on the provision of technical assistance to anyone outside the country. Licences may, however, be granted for these activities. Anyone who is authorised to manufacture and supply war material comes under the supervision of the Inspectorate for Strategic Products (ISP).

With effect from 1 February 1996, questions on whether to grant licences under the Military Equipment Act are examined primarily by the ISP, except in such cases where a matter is deemed to be of fundamental significance or otherwise of particular importance. In such a case, the matter must be handed over to the Government for a ruling. Consultation must take place with the Export Control Council before the ISP hands a case over to the Government. The Director-General of the ISP determines which cases are to be submitted to the Export Control Council before the decision is made.

### Swedish guidelines for exports of military equipment and other foreign cooperation

Under Section 1, second paragraph of the Military Equipment Act, licences for exports of military equipment may only be granted if there are security or defence policy reasons for doing so and provided there is no conflict with Sweden's international obligations or Swedish foreign policy. The principles applied when examining licence applications were established on the basis of government practice and were detailed in the Government's guidelines for the export of military equipment and other foreign cooperation, approved by the Riksdag (cf. 1991/92:174 s. 41 f., Govt Bill 1995/96:31 p. 23 f. and Govt Bill 2017/18:23). The complete text of these guidelines is provided below.

On 15 April 2018, revised guidelines for military equipment exports were adopted. The full text of the Swedish guidelines (Govt Bill 2017/18:23 p. 66 f.) read as follows:

When assessing licences for exports of military equipment or for other cooperation with foreign partners involving military equipment, the following should apply:

A licence should only be granted if the export or cooperation:

1. is needed in order to meet the Swedish Armed Forces' requirements for equipment or expertise, or there are other security policy reasons for granting it, and
2. it is not incompatible with the principles and objectives of Sweden's foreign policy.

When considering a licence application, a holistic assessment of all relevant circumstances shall be made, with the basic principles mentioned above as the point of departure.

In terms of foreign policy, there are no obstacles to cooperation with, or exports to, the Nordic countries, the Member States of the European Union or the traditionally non-aligned countries in Europe. In principle, cooperation with these countries may be considered consistent with Sweden's foreign and security policy.

A licence may only be granted to a government, a government authority or a government-authorised recipient. Furthermore, exports of military equipment require an end-user certificate, unless this is not necessary. A state which, in contravention of an undertaking to Sweden, has allowed – or failed to prevent – re-export of Swedish military equipment will in principle not be eligible to receive such equipment from Sweden as long as these circumstances remain.

Licences for exports or for other cooperation with foreign partners under the Military Equipment Act shall not be granted if this would contravene an international agreement to which Sweden is a party, a decision by the UN Security Council, the Organisation for Security and Cooperation in Europe (OSCE) or the European Union, or international legal rules concerning exports from neutral states in times of war (unconditional obstacles).

Respect for human rights and the democratic status of the recipient country are key assessment requirements. The weaker the democratic status the less scope for granting a licence. Serious and extensive human rights violations or grave deficiencies in the recipient country's democratic status constitute obstacles to granting a licence.

The licencing assessment shall also take into account whether the export or cooperation runs counter to equitable and sustainable development in the recipient country.

Licences should be granted for exports of equipment classified as other military equipment. This presumption applies if the recipient state is not involved in an armed conflict with another state or subject to internal armed unrest, if no serious and extensive human rights violations are taking place in the recipient state, if there are no grave deficiencies in the recipient state's democratic status, and if there are no unconditional obstacles.



Licences should be granted for exports of equipment classified as other military equipment. This presumption applies if the recipient state is not involved in an armed conflict with another state or subject to internal armed unrest, if no serious and extensive human rights violations are taking place in the recipient state, if there are no grave deficiencies in the recipient state's democratic status, and if there are no unconditional obstacles.

An export licence that has been granted shall be revoked if an unconditional obstacle arises. A licence should also be revoked if the recipient state becomes involved in an armed conflict with another state or becomes subject to internal armed unrest. Exceptionally, it should be possible to forego the revocation of a licence in the latter two cases, if consistent with the rules and the principles of international law and the objectives of Swedish foreign policy.

Licences should be granted for exports of spare parts for military equipment previously exported or transferred under a licence, provided there are no unconditional obstacles. The same should apply to special ammunition for previously supplied military equipment and other deliveries directly connected to previously supplied military equipment. Follow-on deliveries shall be assessed on a case-by-case basis in accordance with the above-mentioned requirements.

Regarding agreements with a foreign partner on the joint development or manufacture of military equipment, the basic criteria mentioned above are to be applied when licence applications are assessed. Exports to the partner country under the agreement should be permitted unless an unconditional obstacle arises. Exports from a partner country to a third country under the agreement should be assessed by weighing together the Swedish interest of the cooperation, the interest of maintaining responsible export controls, and the Swedish contribution's importance for the equipment or the cooperation.

In cases involving more extensive and, for Sweden, more important international partnerships in the field of military equipment, an intergovernmental agreement should be concluded between Sweden and the partner country. The Advisory Council on Foreign Affairs should be consulted before such agreements are concluded.

## **Overriding criteria and assessment criteria**

The guidelines have broad parliamentary support and are used by the ISP when assessing export licence applications in accordance with the Military Equipment Act and the Military Equipment Ordinance.

In addition to the guidelines themselves, international commitments Sweden has made and is bound by are also considered. These are, first and foremost, the EU Common Position (2008/944/CFSP) on arms exports and Articles 6 and 7 of the UN Arms Trade Treaty, but may also include other commitments, e.g. not to export anti-personnel mines under the Ottawa Convention.

## EU Firearms Regulation

The Ordinance (2013:707) on the control of certain firearms, their parts and ammunition, and including certain amendments to the Military Equipment Ordinance (1992:1303) came into force on 30 September 2013.

The Ordinance and the amendments to the Military Equipment Ordinance complement Regulation (EU) No 258/2012 of the European Parliament and of the Council of 14 March 2012 implementing Article 10 of the United Nations' Protocol against the illicit manufacturing of and trafficking in firearms, their parts and components and ammunition, supplementing the United Nations Convention against Transnational Organised Crime (UN Firearms Protocol), and establishing export authorisation, and import and transit measures for firearms, their parts and components and ammunition (the Firearms Regulation), which regulates licences to export civilian firearms, their parts and ammunition outside the EU, as well as certain import and transit measures for such exports. A list of the firearms, their parts and essential components and ammunition that are subject to control is contained in an annex to the Firearms Regulation.

The ISP is the licensing authority under the Ordinance.

## Regulation (EU) 2021/821 of the European Parliament and of the Council setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items

### Common EU legislation

In 2021, the European Parliament and the Council adopted Regulation (EU) 2021/821 of the European Parliament and of the Council setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (the Dual-Use Regulation). The Dual-Use Regulation came into force on 9 September 2021, replacing an EU regulation from 2009, Council Regulation (EC) No 428/2009. Among other things, the scope of control was extended to cover the export of unlisted cyber-surveillance products and the provision of technical assistance. A mechanism was also introduced that enables licensing requirements to be imposed based on other Member States' national control lists, as well as two new general EU licences: intra-group transfer of software and technology, and encryption. Unlike the international export control regimes, the Regulation is legally binding for Sweden and all other EU Member States. The purpose is to establish free movement of controlled items within the internal market while ensuring that the various national systems to achieve effective control of exports to third countries are harmonised between Member States as far as possible.

The Regulation unites Member States' undertakings within the scope of the international export control regimes with the greatest possible freedom of movement of goods within the internal market. Developments within the regimes are taken into account through annual amendments and

updates of the item lists included in the Regulation. The annexes to the Regulation have direct effect at national level.

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The assessment of licence applications is facilitated by the inclusion of common assessment criteria in the Regulation. However, licences are granted at the national level (see below). There are also general community licences for exports of certain items to certain specified third countries. This type of licence facilitates the work of exporting companies in that the same licence can be invoked regardless of where in the EU the exports originate.

## **Swedish legislation**

In Sweden, the export control of dual-use items and of technical assistance in connection with these items is governed by the Dual-Use Items and Technical Assistance Control Act (2000:1064). This Act contains provisions supplementing the EU's Dual-Use Regulation. Following on from the revision of the Dual-Use Regulation in 2021, a number of amendments to the Act were made and entered into force on 1 August 2022.

Unlike exporters which are subject to the military equipment legislation, no basic operating licences under the export control legislation are required for exporters that produce or otherwise trade in dual-use items. Nor are these exporters obliged to make a declaration of delivery in accordance with the export control legislation. However, a company is obliged to make a fee declaration if it has supplied controlled items subject to supervision by the ISP. This includes sales within and outside Sweden. A declaration must also be submitted by the party that produces, prepares, consumes, imports or exports chemical precursors that can be used for the manufacture of chemical warfare agents.

Where an exporter ought to be aware of or have reason to suspect that a dual-use item which the company in question intends to export, and which is not listed in Annex I to the EU's Dual-Use Regulation, is intended for use in connection with the production, etc., of weapons of mass destruction; for a military end-use in a country covered by a weapons embargo; or to use as parts of or components in military equipment that has been exported from an EU Member State's territory without a licence or in breach of a licence; there is an obligation on the company to notify the ISP. Failure to comply with this obligation is a criminal offence. After notification, the ISP is required to examine and decide whether a licence should be required in the individual case. The same applies if the exporter has reason to suspect that a cyber-surveillance item not listed in Annex I to the EU Regulation is intended for use in connection with internal repression and/or the commission of serious violations of human rights and international humanitarian law under Article 5 of the same Regulation.

## **The catch-all clause**

As noted above, a licence may also be required pursuant to Article 4 of the Dual-Use Regulation for exports of items that are not specified in the annexes to the Regulation (non-listed items) among other things if the

exporter has been informed by the Swedish authorities that the item is or may be entirely or partly intended to be used in connection with the production etc. of weapons of mass destruction or missiles that are capable of delivering such weapons. This catch-all clause has been included to prevent the regulations from being circumvented due to the fact that, on account of rapid technological developments, the lists are seldom completely comprehensive.

For the catch-all clause to be applicable, the exporter must have been informed of the item's area of use by the Swedish authorities. However, if the exporter has reason to suspect that an item is entirely or partly intended for uses regulated in Article 4(1) of the Regulation, they are obliged to report this to the Swedish authorities. The ISP will then determine whether a licence is required for the export.

In certain cases, the catch-all clause also entails special licensing requirements for exports of non-listed items that are or may be intended for military end-use in a country subject to a weapons embargo, as well as for non-listed items that are or could be intended for use as parts for or components of illegally exported military equipment.

# Abbreviations

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AG	Australia Group
ATT	Arms Trade Treaty
BTWC	The Biological and Toxin Weapons Convention
CWC	Chemical Weapons Convention
COARM	Working Party on Non-Proliferation and Arms Exports Sub-Working Group on Conventional Arms Exports
CoCom	Coordinating Committee on Multilateral Exports Controls
CONOP	Working Party on Non-Proliferation and Arms Exports Sub-Working Group on Non-Proliferation and Disarmament
DUCG	Dual-Use Coordination Group
EDF	European Defence Fund
EU	European Union
FMV	Försvarets materielverk (Swedish Defence Materiel Administration), Stockholm
UN	United Nations
FOI	Swedish Defence Research Agency
CFSP	EU Common Foreign and Security Policy
IAEA	International Atomic Energy Agency
ISP	The Inspectorate of Strategic Products
JCPoA	Joint Comprehensive Plan of Action
ME	Military equipment
MC	Military equipment for combat purposes
LoI	Letter of Intent
MANPADS	Man-Portable Air Defence Systems
ML	Military list
MTCR	Missile Technology Control Regime
NATO	North Atlantic Treaty Organization
NA	National additions, where applicable
NPT	Treaty on the Non-Proliferation of Nuclear Weapons
NSG	Nuclear Suppliers Group
OECD	Organisation for Economic Co-operation and Development
OSSE	Organisation for Security and Cooperation in Europe
DUI	Dual-Use Items
SCB	Statistics Sweden
SOFF	Swedish Security and Defence Industry Association
SSM	Swedish Radiation Safety Authority
WA	Wassenaar Arrangement
WPDU	Working Party on Dual-Use Goods
ZC	Zangger Committee
OME	Other military equipment

## Guide to other sources

Australia Group: [www.australiagroup.net](http://www.australiagroup.net)  
European Parliament: [www.europarl.europa.eu](http://www.europarl.europa.eu)  
Council of the European Union: [www.consilium.eu](http://www.consilium.eu)  
European Union: [www.europa.eu](http://www.europa.eu)  
Export Control Council: [www.isp.se/om-isp/vara-rad/exportkontrollradet](http://www.isp.se/om-isp/vara-rad/exportkontrollradet)  
United Nations: [www.un.org](http://www.un.org)  
Action plan for business and human rights:  
<https://www.regeringen.se/informationssystem/2015/08/handlingsplan-for-foretagande-och-manskliga-rattigheter/>  
International Atomic Energy Agency: [www.iaea.org](http://www.iaea.org)  
Inspectorate of Strategic Products: [www.isp.se](http://www.isp.se)  
Missile Technology Control Regime: [www.mtrc.info](http://www.mtrc.info)  
Nuclear Suppliers Group: [www.nuclearsuppliersgroup.org](http://www.nuclearsuppliersgroup.org)  
Organisation for the Prohibition of Chemical Weapons: [www.opcw.org](http://www.opcw.org)  
Organisation for Security and Cooperation in Europe: [www.osce.org](http://www.osce.org)  
Stockholm International Peace Research Institute: [www.sipri.org](http://www.sipri.org)  
Swedish Radiation Safety Authority: [www.ssm.se](http://www.ssm.se)  
Swedish Export Control Society: [www.exportkontrollforeningen.se](http://www.exportkontrollforeningen.se)  
Swedish Ministry for Foreign Affairs: [www.ud.se](http://www.ud.se)  
Wassenaar Arrangement: [www.wassenaar.org](http://www.wassenaar.org)  
Zangger Committee: [www.zanggercommittee.org](http://www.zanggercommittee.org)

## Ministry for Foreign Affairs

Extract from the minutes of the Government meeting of den 3 April 2025

Present: Minister Svantesson, Chair; and Ministers Ankarberg Johansson, Edholm, Waltersson Grönvall, Strömmer, Forssmed, Forssell, Slottnér, M Persson, Kullgren, Liljestrand, Bohlin, Carlson, Pourmokhtari, Rosencrantz, Dousa, Larsson

Report submitted by: Minister Dousa

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The Government adopts this Communication Strategisk exportkontroll 2024 – krigsmateriel och produkter med dubbla användningsområden