



ASSOCIATION OF CERTIFIED
SANCTIONS SPECIALISTS

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INTRODUCTORY GLOSSARY OF EXPORT CONTROL TERMS AND ACRONYMS

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Prepared by the ACSS Export Controls Taskforce

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A

Airway bill is a transportation document issued by an international air carrier that contains the terms and conditions of the shipment and a description of the goods (type, volume, weight). The contents and destination information in the airway bill allows customs authorities to verify that the goods comply with import and export regulations.

Arms Export Control Act (AECA) is a US federal law providing the legal framework for exporting and importing defense articles and services. It designates items on the USML for export control and requires licenses from the State Department for their exportation.

Arms Trade Treaty, or ATT, is an international treaty that regulates the international trade in conventional arms to prevent and eradicate illicit arms transfers and reduce human suffering.

Australia Group is a multilateral export controls regime established to harmonize export controls and to ensure that exports do not contribute to the development of chemical or biological weapons.

Automatic Identification Systems (AIS) are transponders that automatically provide position, identification, and other information about a ship to other ships and coastal authorities. [add sentence on why this is important for EC; how this is connected to EC]

B

Bill of lading is a shipping document that involves the shipper (responsible for packing and preparing the shipment for transportation), the carrier (the shipping line, haulage company, or airline carrying the cargo), and the consignee (designated to receive the shipment). It contains details about the goods (weight, volume), details about the shipment (port of loading, port of discharge), and details on the shipper, carrier, or consignee. [add sentence on why this is important for EC; how this is connected to EC]

Biological Weapons Convention, or BWC, is an international treaty aimed at banning the development, production, and stockpiling of biological and toxin weapons.

Bureau of Industry and Security, or BIS, is an office within the US Department of Commerce responsible, among other things, for controlling exports and activities covered by the ECRA and the EAR.

C

Catch-all clause or end-use/r controls is when a commodity, technology, or software is subject to export controls even if the item is not listed in a control list following concern because of its end-use, end-user, or final destination.

Chemical weapons are defined in the Australia Group Common List Handbook as: “a toxic chemical loaded into a delivery system such as a munition (i.e., a complete device exposing a population to a substance that can cause death or other injuries through its chemical actions).”

Chemical Weapons Convention is an international treaty that seeks to eliminate chemical weapons and prevent their use in armed conflict.

Commerce Control List, or CCL, is the list of controls maintained under the EAR. The list is maintained by the BIS. The CCL is divided into ten categories:

- (0) Nuclear Materials, Facilities and Equipment, and Miscellaneous;
- (1) Materials, Chemicals, "Microorganisms," and Toxins;
- (2) Materials Processing;
- (3) Electronics Design, Development and Production;
- (4) Computers;
- (5) Telecommunications;
- (6) Sensors;
- (7) Navigation and Avionics;
- (8) Marine;
- (9) Propulsion Systems, Space Vehicles, and Related Equipment.

Common High Priority List, or CHPL, is a list of 50 tariff lines divided into 6 categories with associated HS codes established, among other things, by the G7. Because of their importance to Russia's war efforts, these lines pose a heightened risk of illicit diversion to Russia.

Controlled Exports are specific types of exports regulated by the US federal government (e.g., commodity, biologics, equipment, software, encryption, technology, or technical information) sent from the US to a foreign person or destination. Controlled exports in the EU refer to strict regulations under Regulation (EU) 2021/821 for the control of exports, brokering, technical assistance, transit, and transfer of dual-use items – goods and technology with both civilian and military applications.

D

DDTC stands for Directorate of Defense Trade Controls. DDTC, which is part of US Department of State, is responsible for administering and enforcing export controls on defense articles, services, and technology under the International Traffic in Arms Regulations (ITAR).

Deemed export: The release of technology or source code to a foreign person, which is considered an export to that person's home country.

Denied Persons List, or DPL, is maintained by the BIS and lists persons or entities denied export privilege under the EAR.

Denial orders are legal orders under US regulations prohibiting a person or entity from participating in specific transactions.

DG TRADE stands for Directorate General for Trade (DG Trade). The European Commission, primarily through DG TRADE, is central to managing EU export controls, especially for dual-use items, supported by the EEAS for arms and non-proliferation and a network of national authorities within each member state for licensing and enforcement.

Dual-use items mean commodities, technology, or software that can be used for both civil and military purposes. They include items that can be used for the design, development, production, or use of nuclear, chemical, or biological weapons or their means of delivery. They also include all items that can be used for both non-explosive uses and assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices. (what about EU definition?)

Dual-use refers to items with commercial, military, or proliferation applications under the EAR. While this term is used informally to describe items subject to the EAR, purely commercial items and certain munitions listed on the Wassenaar Arrangement Munitions List (WAML) or the Missile Technology Control Regime Annex are also subject to the EAR. Dual-use, under UK regulations, means it is usable for both civil and military purposes. Can we add the EU definition?

E

EAR stands for Export Administration Regulations, a set of regulations administered by the BIS that govern, among other things, the export or reexport of US dual-use items.

EAR99: If an item falls under US Department of Commerce jurisdiction and is not listed on the CCL, it is designated as EAR99. EAR99 items generally consist of low-technology consumer goods and do not require a license in many situations. However, if a proposed export of an EAR99 item is to an embargoed country, to an end-user of concern, or in support of a prohibited end-use, you may be required to obtain a license.

ECJU stands for Export controls joint unit, an agency within the UK government.

ECJU administers the UK's system of export controls and licensing for military and dual-use items and is part of the Department for Business and Trade.

ECRA stands for the US Export Control Reform Act of 2018. It authorizes the US President to control exports for national security and foreign policy purposes. ECRA is the statutory basis for the EAR.

Embargo is an official government-imposed restriction or prohibition on trade with a specific country, group of countries, or particular goods and services. Embargoes are typically enacted as a foreign policy tool to exert political or economic pressure, often in response to political disagreements, human rights violations, or security threats posed by the targeted nation, and include, among others, (i) comprehensive embargo (complete ban on all trade with a particular country, covering goods, services, and sometimes financial transactions), (ii) partial or selective embargo (restriction targeting specific products, industries, or entities, such as a ban on arms, technology, or certain raw materials), (iii) arms embargo (ban on the export of military equipment and weapons to the targeted nation or organization)

Entity list, or EL, is a list maintained by the BIS that identifies foreign parties that are prohibited from receiving some or all items subject to the EAR unless the exporter secures a license. These parties present a greater risk of diversion to weapons of mass destruction (WMD) programs, terrorism, or other activities contrary to US national security and/or foreign policy interests.

Export means a shipment or transmission from a territory to another territory or the release of technical data.

ertified Export Controls Specialist – CXS

Export controls are the laws, regulations, and policies governments implement to regulate and control the export of certain goods, technologies, software, and services across national borders. These controls protect national security, promote foreign policy interests, and prevent the proliferation of weapons of mass destruction (WMDs).

Export license is a generic term used to refer to the different types of export authorizations issued by any government, authorizing operations subject to controls under the associated export controls regulations.

F

Freight forwarder is a company that organizes goods on behalf of its clients and oversees the entire shipping process. A freight forwarder can also assist with customs clearance. Fundamental research means research in science, engineering, or mathematics under US regulations, the results of which ordinarily are published and shared broadly within the research community and for which the researchers have not accepted restrictions for proprietary or national security reasons.

G

Geneva Protocol on Chemical and Biological Weapons, formerly known as the Protocol for the Prohibition of the Use in War of Asphyxiating, Poisonous or Other Gases, and of Bacteriological Methods of Warfare, is an international treaty that prohibits the use of chemical and biological weapons in armed conflict.

Global Export Control Coalition (GECC) is an international coalition of 39 countries (27 EU member states, Australia, Canada, Iceland, Japan, Lichtenstein, New Zealand, Norway, Korea, Switzerland, Taiwan, the UK and the US), created in 2022 following the Russian invasion of Ukraine and which coordinates efforts to enforce export controls and sanctions.

H

HS code is a unique identifier of a good created by the World Customs Organization for customs purposes.

I

International Maritime Organization (IMO) number is a unique seven-digit number on a maritime vessel. Maritime vessels are required to display their name and IMO number in a visible location. A vessel's IMO number is intended to be permanent regardless of a change in ownership or name. This allows for the identification of the vessel itself. Sanctions evaders may obscure the IMO number or even change it illegally to disguise the vessel's connection to a country subject to sanctions, such as North Korea.

International Atomic Energy Agency, or IAEA, was established in 1957 as an autonomous body under the UN. It promotes the peaceful use of nuclear energy and works to prevent its use for military purposes, including atomic weapons.

International Emergency Economic Powers Act (IEEPA) is a 1976 US federal law that grants the president broad power to regulate international commerce in response to a national emergency threatening the US's security, foreign policy, or economy. The IEEPA is a foundational law and the primary tool by which the US imposes sanctions, freezes assets, and restricts trade with foreign entities. For over two decades, IEEPA was the governing authority for US export controls until the Export Administration Act (EAA) lapsed and was eventually superseded by the Export Control Reform Act (ECRA) in 2018. IEEPA remains vital because it provides a mechanism for the US President to act quickly in response to national emergencies, including imposing export restrictions when traditional export control statutes may not fully cover the situation or when there are gaps in their coverage.

International Traffic in Arms Regulations, or ITAR, are a set of US federal regulations administered by the DDTC that control the export and import of defense articles and services, among other things.

Item classification determines the appropriate export controls classification for a specific product, technology, or software based on the regulations applicable to the product, technology, or software.

L

License exception refers to a situation in which an exception applies to the license requirements, and the operation subject to export controls can be performed without an export license.

M

Military items mean commodities, technology, or software with a military application, whether because they are listed in the corresponding control lists or specifically designed for military use with specific characteristics.

Multilateral export controls regimes are frameworks through which countries collaboratively (i) agree to restrict the export of certain goods, technology, or software that may pose a risk to international security and (ii) develop best practices for these exports. These regimes traditionally refer to the Wassenaar Arrangement, Australia Group, Missile Technology Control Regime, Nuclear Supplier Group, and the Zangger Committee.

Munitions List includes articles, services and related technical data designated as defense articles and defense services pursuant to the Arms Export Control Act.

N

Nuclear Non-Proliferation Treaty, or NPT, is an international treaty aimed at preventing the spread of nuclear weapons, promoting peaceful uses of nuclear energy, and advancing nuclear disarmament.

Nuclear Suppliers Group, or NSG, is a multilateral export controls regime established to contribute to the non-proliferation of nuclear weapons by implementing two sets of guidelines for nuclear and nuclear-related exports.

O

Open General Export Licenses, or OGEL, is a type of export license allowing, under conditions, the export of specific goods, technologies, or software to a certain destination without needing another export license.

Open Individual Export Licenses, or OIELs, are a type of export license that allows the export of specific goods, technologies, or software to specified destinations and entities under certain conditions. Organisation for the Prohibition of Chemical Weapons (OPCW) is an international organization established in 1997 to oversee the implementation of the Chemical Weapons Convention (CWC), which aims to eliminate chemical weapons and prevent their use globally. Based in The Hague, Netherlands, the OPCW enforces the CWC's provisions, promotes chemical disarmament, and supports peaceful uses of chemistry.

P

Prohibited Party/Restricted Party means an individual, organization or entity appearing on any one of the U.S. government restricted party lists (e.g., the Department of Treasury Specially Designated Nationals List (SDN) or the Department of Commerce Entity List) as a "restricted party" prohibited from receiving U.S. technology or financial transactions and/or with whom U.S. persons are restricted from engaging in export of financial transactions.

R

Reexport means a shipment or transmission of a controlled item from one foreign country to another or the release of technical data from one foreign country to another.

Retransfer means changing the use or user of a controlled item in a foreign country.

S

Sanctions restrict or prohibit trade and financial relations for foreign policy and national security purposes. They are meant to isolate the target by denying it access to resources. Sanctions may include trade embargoes or boycotts, asset freezes, bans on cash transfers, bans on technology transfers, and restrictions on travel. The key difference between sanctions and export controls is that export controls are item-specific, requiring licenses for particular goods or technologies to protect national security and foreign policy, while economic sanctions are broader, targeting entire countries, sectors, or individuals with import/export restrictions and financial transaction bans to exert economic pressure and change behavior. Export controls focus on what is being exported, whereas sanctions focus on who, where, or what part of the economy is being affected.

Screening generally involves reviewing information about a person or transaction to determine whether restricted elements exist. More technically, it involves comparing information to a list of names or terms to determine whether restricted elements exist.

Standard Individual Export License, or SIEL, is a type of export license from the UK government that allows the export of a defined quantity and associated amount of specified goods and technologies to a specific entity under certain conditions.

T

Trade means the arrangement of transactions to purchase, sell or supply controlled items.

Trade finance is a set of financial instruments and products provided by banks and financial service providers that support international trade by simplifying transactions.

There are different methods of payment in trade finance including but not limited to:

-Cash advance is when the buyer pays the seller before the goods have been shipped.

-Letters of credit: a legally binding document issued by a bank upon which the bank guarantees the exporter of the timely and correct payment from a buyer. Export controls matter for people working in a bank's trade finance department as they establish legal boundaries on what the bank's clients trade internationally, potentially impacting decisions like letter of credit (LC) issuance and payment approvals.

Transshipment is the process of transferring cargo or goods from one vessel or mode of transportation to another during their journey to the final destination. This typically occurs at intermediary points, such as ports, airports, or logistical hubs.

Transit means transporting a controlled item entering and passing through a territory with a destination outside the said territory.

U

UN Register of Conventional Arms is a UN initiative aiming at encouraging states to voluntarily report their international transfers of major conventional weapons. The UN Register promotes transparency in arms transfers, helping to reduce misunderstandings, prevent conflicts, and curb the illicit arms trade.

The UN Office for Disarmament Affairs (UNODA) manages the Register.

Unverified List or UVL is a list maintained by the BIS which identifies parties whose bona fides BIS has been unable to verify. No license exceptions may be used for exports, reexports, or transfers (in-country) to unverified parties.

USML stands for United States Munitions List: Articles, services and related technical data designated as defense articles and defense services pursuant to the Arms Export Control Act (including satellites and spacecraft).

W

Wassenaar Arrangement is a multilateral export controls regime established in 1996 to promote transparency and responsibility in the export of conventional arms and dual-use goods and technologies. Named after Wassenaar, a town in the Netherlands, where the initial meeting occurred, the arrangement seeks to prevent destabilizing arms and sensitive technology accumulations by coordinating export controls policies among participating countries.

World Trade Organization, or WTO, is an international organization established in 1995 that regulates global trade and provides a framework for negotiating and enforcing trade agreements and a platform for resolving trade disputes.

About ACSS

The Association of Certified Sanctions Specialists is the leading sanctions and export controls association delivering best-in-class training, offering the CSS and CXS credentials and fostering a dynamic, global community of sanctions and export controls professionals.



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