

ORDER ECM

Order ECM/551/2025 amending several annexes to the Regulation on the control of foreign trade in defense material, other material, and dual-use products and technologies, approved by Royal Decree 679/2014, of August 1

Last June 5, 2025 came into force Order ECM/551/2025, of May 30, which modifies the annexes on international trade control contained in the Royal Decree 679/2014, relating to the export and import of defense material, other dual-use material, and products and technologies. The main purpose of this regulatory provision is to strengthen control mechanisms in an international context marked by growing challenges in the areas of security, defense, and the non-proliferation of sensitive weapons and technologies.

In compliance with its objective, the Order modifies the annexes I.1, III.1, III.3, III.4 and III.5. In accordance with the powers conferred on the competent Ministry by the fourth final provision of Royal Decree 679/2014, and pursuant to the provisions of Article 9.1 of Regulation (EU) 2021/821. The main regulatory changes introduced are detailed below:

First, the order introduces an expanded list of chemical substances and components classified as chemical warfare agents, in accordance with the Wassenaar Arrangement and the Chemical Weapons Convention. This inclusion strengthens the State's ability to identify and restrict the export, import, or transit of products with potential use in armed conflict or terrorist actions.

Secondly, the order modifies the content of the Annex III.1, specifically point 1.a) of category 7, with a New detailed listing of nerve agents for chemical warfare, including explicit references to the following compounds and their CAS numbers: Sarin (GB), Somán (GD), Tabún (GA), VX, as well as Amitón, and other derived substances such as phosphoramidate fluorides, phosphoramidofluoridates and biquaternary carbamates.

It is also added at the end of the Annex III.3 the category 1C903, under which certain energetic materials and substances specifically related to the nitrocellulose (CAS 9004-70-0) and the trinitrotolueno (TNT) (CAS 118-96-7). This incorporation responds to the need to prevent the diversion of these compounds for the manufacture of improvised explosive devices (IEDs) and other devices with harmful purposes.

In addition, the same category 1C903 is included in the Annex III.4, relating to the control of exports or dispatches of products not included in Annex I to Regulation (EU) 2021/821.

This inclusion means that, due to their potential risk, any Member State of the European Union may subject these products to control, even if they are not listed in Annex I of the aforementioned Regulation.

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Finally, regarding the **Annex III.5**, which regulates products subject to export control not included in Annex I of Regulation (EU) 2021/821, extends the coverage of national control by including **emerging technologies** of special sensitivity, such as:

Equipment and materials for **additive manufacturing** (3D printing).

Components for the **semiconductor manufacturing**.

Applications of **artificial intelligence** with possible military or repressive use.

These additions have been discussed and validated within the framework of the Wassenaar Arrangement and allow the State to anticipate the risks of proliferation of technological capabilities with potential strategic impact.

In short, Order ECM/551/2025 not only expands the list of controlled products, but also modernizes the control approach, integrating more precise technical criteria, emerging technologies, and measures adapted to the current geostrategic context

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