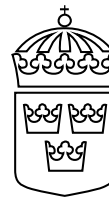


Government Communication

2025/26:114



Strategic Export Controls in 2025 – Military Equipment and Dual-Use Items

Comm.
2025/26:114

The Government submits this Communication to the Riksdag.

Stockholm 1 April 2026

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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 2025. 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 its policy on strategic export controls in 2025, i.e. the export controls on military equipment and dual-use items. The term ‘dual-use items’ refers to items, software and technologies produced for civilian use that can also be used for military purposes, or for the production of weapons of mass destruction and their means of delivery.

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 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. Controlling the export of dual-use items is also necessary to reduce undesirable and destabilising development of conventional military capabilities. By ensuring that dual-use items are not exported to unsuitable recipients for 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 42nd time that the Government has reported on Sweden’s 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 its 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 controls 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. This year's statistics, like those of recent years, also 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 2025, a major impact on strategic export controls has continued to be the deteriorating international security situation. Russia's aggression against Ukraine since 2014 and Russia's full-scale invasion of the country which began 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 also during 2025, and has had considerable consequences in the area of export control as well.

In response to Russia's full-scale invasion of Ukraine, the EU imposed a number of sweeping and unprecedented sanctions on Russia, with additional sanctions packages in 2023, 2024 and 2025. The sanctions packages include dual-use items, advanced technology and civilian firearms. The sanctions have been tightened during the year under the 16th, 17th, 18th and 19th 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.

The report titled *Ett modernt och anpassat regelverk för krigsmateriel* (SOU 2024:77) (A modern, adapted framework for military equipment) was referred for consultation during the year and the response time expired in March 2025. During the year, the review of Council Common Position 2008/944/CFSP of 8 December 2008 defining common rules governing control of exports of military technology and equipment was concluded.

The EU's export control list was expanded to include products blocked from decision under the multilateral export control regimes by a delegated act of the European Commission in September 2025. In September 2025, Sweden also applied for access to the export control agreement concluded between France, Germany and Spain.

On 1 November 2025, Sweden introduced a national control list of dual-use items.

During 2025, meetings in the multilateral export control regimes continued at the same pace as in 2024 and prior to 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.

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Besides being the licensing authority in export control cases, and the review authority for foreign direct investments, the Inspectorate of Strategic Products (ISP) is also the competent authority in relation to sanctions, including the sweeping sanctions packages that the EU has imposed against Russia.

Summary of the statistical data

Comprehensive statistics on licence approval and on Sweden's 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 2025.

Exports and other activity related to military equipment in 2025 are presented in *Annex I*. 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 2025, 559 companies, government authorities and private individuals held licences for manufacturing or supplying military equipment. Since 2018, the number of licence holders has tripled. The increase relates principally to subcontractors of system manufacturers of military equipment.

In total 61 countries received deliveries of military equipment from Sweden. The value of military equipment exports in 2025 was just over SEK 28 billion. The value of exports thus decreased by around 4 per cent compared to the previous year.

Around 80% of exports went to the 39 countries designated by the Government as established partner countries in the defence and security area. That is around 10 percentage points more than in 2024. The lower share in 2024 is explained mainly by the delivery of two airborne radar systems, with a value of around SEK 6 billion, to the United Arab Emirates (UAE).

In 2025, the USA was the most significant recipient country, followed by Hungary and Brazil. Exports to the USA included a large number of different types of equipment, including recoilless rifles, sensors and tracked vehicles. Deliveries to Hungary and Brazil consisted mainly of the fighter aircraft system JAS Gripen.

In the case of Ukraine, a total of 47 export licences were granted for donations from the Swedish state in 2025, while 24 licences were issued for sales from the Swedish defence industry. In addition, in the past year the ISP has also granted 16 licences for further transfers of military equipment manufactured in Sweden from other countries. Most of the donated and transferred military equipment has consisted of ground combat and rocket systems.

Exports to Israel during the year consisted of concluded follow-on deliveries to private companies comprising components which, at the time of the original delivery, were not counted as military equipment. Deliveries in 2025 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.

2 Military equipment

2.1 Background and regulations

A licence requirement for exports of military equipment is necessary to ensure that exporting 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 UN 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 aligns 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 making the democratic status of the recipient country and its respect for human rights key conditions in the assessment of licence applications. This is unique to Sweden's regulatory framework.

Swedish export control rules are updated when necessary. 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 abroad for exports of light weapons from Sweden. 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. Such controls can be a valuable complement to a strict licence application assessment in countering the leakage 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 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 leakage is deemed to be most substantial. In practice, these are five types of anti-tank systems and short-range man-portable air-defence systems (MANPADS).

The ISP is responsible for carrying out post-shipment inspection 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. The 39 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 inspection 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

accordance with the 2030 Agenda in the recipient country. 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 assessment 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 work on sustainability. Among other things, 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 have been introduced. 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, more than 6 100 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 working to promote 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 fourth 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 pursued 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 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 met in cooperation with other countries and organisations. Sweden is best defended within NATO. Sweden's NATO membership increases security for both Sweden and 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 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 essential to 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, artillery ammunition and integrity-critical aspects of the command-and-control sector, such as sensors, electronic warfare and crypto, as strategic areas of the equipment 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 capabilities.

Currently, the most important military product 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.

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Equipment support to Ukraine

As a consequence of Russia's violation of international law with its full-scale invasion of Ukraine, the Government decided 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 2025, three additional military support packages were provided. In total, the Government has decided on 21 military aid packages since 2022. The support packages include weapons, ammunition, air defence systems, artillery systems, combat vehicles, combat boats and sensors, but also financial donations to multilateral initiatives and funds. The support packages include donations from the Swedish Defence Forces war organisation as well as the acquisition of newly manufactured equipment for donation to Ukraine. See *Annex I* for more information.

In addition, Sweden has assisted Ukraine with extensive civilian support, which is largely financed by aid funds. Interventions include humanitarian assistance, macro-financial assistance, support for reform and construction, and civilian crisis management. The total military and civilian support provided amounts to approximately SEK 128 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. Furthermore, Sweden has obligations under Article 3 to develop our own 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. The Government notes that 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 regulatory framework 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* (SOU 2024:77) (A modern, adapted regulatory framework for military equipment) 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 until the end of March 2025. In September 2025, the Government decided that Sweden should apply for access to the export control agreement between France, Germany and Spain, which also took place the same month.

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 the Common Position (2008/944/CFSP) of 8 December 2008

defining common rules governing control of exports of military technology and equipment. 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 Norway and the United Kingdom).

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 products 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 2025, COARM worked on a revision of the Common Position, including clearer formulations on the

risk of exporting countries taking into account the risk of exported equipment being used to perpetrate gender-based violence.

Through COARM, the EU pursues an active policy of dialogue with third countries on export controls. In this context, dialogue meetings were held during 2025 with Norway and Canada, 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 108 denial notifications from other Member States and Norway in 2025.

Sweden submitted one denial notification. The denial related to Vietnam. 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.

If a Member State is considering granting a licence for an essentially identical transaction that another Member 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 did not receive any consultation enquiries from any other EU Member States in 2025. Two consultations were 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 work to implement the Directive. It is assisted in this work by an expert group of representatives from the Member States. The Expert Group held four meetings during 2025.

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The main focus of the Expert Group's work during the year remained the evaluation of the Member States' implementation of the ICT Directive and to consider adjustments to the Directive within the framework of the omnibus package of reforms to simplify the EU rules applicable to the European defence industry.

Exports of civilian firearms

The revised Firearms Regulation (Regulation [EU] 2025/41) of the European Parliament and of the Council on import, export and transit measures for firearms, essential parts and ammunition, and implementing Article 10 of the UN Protocol on the illicit manufacture and trafficking of firearms, parts of firearms and ammunition, entered into force; annexed to the United Nations Convention against transnational organized crime (UN Firearms Protocol) (Firearms Regulation) entered into force on 11 February 2025. It replaced the previous Firearms Regulation (EU) 258/2012. However, the provisions in the previous Firearms Regulation on licence requirements remain in force until 11 February 2029.

The Regulation aims to combat and prevent illicit trade in firearms to and from the EU, and 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 Firearms 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 Firearms Regulation, those aspects that are encompassed by the Common Position must be taken into consideration when assessing licence applications.

There are provisions that complement the Firearms Regulation in the Ordinance (2013:707) concerning the control of certain firearms, parts of firearms and ammunition. The ISP is the regulatory authority for cases under the Firearms Regulation. In 2025, 228 cases were received by the ISP, and 224 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 the EU's regulations, and 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.

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. 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, 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.

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 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

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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 2025 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, Lithuania and the USA; recoilless rifles to Australia, Finland, Japan, Latvia, Lithuania, Poland, South Africa, the Czech Republic, Tunisia and the USA; and portable air defence systems to Argentina, Canada, Lithuania and Ukraine. 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.

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 2025, 117 states had ratified the Treaty and a further 25 had signed it.

In 2025, the 11th 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 leakages in arms trade.

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 2025, Sweden participated in the meetings of the working groups and the Conference of States Parties. 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.

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)

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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, recoilless rifles 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. 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. Sweden participated in the most recent Review Conference within the Programme of Action in 2024, where the State Parties decided to set up a new technical working group to address issues related to illegal SALW manufacturing, including new technologies such as 3D-printing.

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.

In 2025, Sweden has contributed to the Small Arms Survey, an organisation whose activities include updating and developing the global databases on stockpiling, illicit trade and the proliferation of SALW, as well as information on armed violence.

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 2025, the ISP participated in the 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.

3 Dual-Use Items

3.1 Background and definitions

The term ‘dual-use items’ means items, software and technology intended for civilian use that may also be used for military purposes or for the prefabrication of weapons of mass destruction or missiles capable of delivering such weapons. Dual-use items may also include certain other products 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 products that have then been used for military purposes. Export controls of dual-use items are also necessary to reduce 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 good is deemed to be sensitive and its export is therefore subject to control. The export control measures required in the EU must be well-delineated 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 products are sold in the EU’s single 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 (see section 3.5 for a review of the regimes), aimed at limiting the spread of sensitive goods and technologies, including those that can be used to manufacture weapons of mass destruction.

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Export control itself is always exercised at national level, but extensive coordination also takes place through international export control 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 that are continuously updated in the international export control regimes (see section 3.5 on the export control regimes) are added 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 control list thus constitutes a compilation of the control lists of the international export control regimes and is updated annually. In this way, the EU contributes to codifying controls of military equipment and dual-use items in accordance with the international standards that apply in the major producer countries in the world. Even countries outside the EU and the export control regimes have chosen to include the EU's Annex I in their export control legislation as it is comprehensive and clear.

National control list

According to Article 9.1 of the Dual-Use Regulation, a Member State may prohibit or impose a licence 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 introduced a national control list of items under Article 9.1 on 1 November 2025.

Under Article 10 of the Dual-Use Regulation a Member State may impose a licensing requirement for the export of items not listed in Annex I on the basis of a national control list of items adopted by another Member

State pursuant to Article 9, and if the competent authority has informed the exporter that the items 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.

Other control options

Article 4(1) of the Dual-Use Regulation establishes that Member States may make use of a mechanism that permits products not included in Annex I of the Dual-Use Regulation to be subject to authorisation (catch-all mechanism). The mechanism can be used if the exporter has been informed by the Swedish authorities that the items in question are or may be intended, in their entirety or in part, for use in the production, etc. of weapons of mass destruction. The mechanism can also be applied in other cases, such as where the items are intended for military end-use if the purchasing country or country of destination is subject to 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 entirely or partly intended for uses referred to in Articles 4(1) of the EU Regulation, they are required to report this to the Swedish authorities. The competent authority will then determine whether a licence is required for the export.

Article 4(3) provides that a Member State may enact or maintain national legislation imposing a licence 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 made use of this and introduced requirements 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 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 mechanism is known as the catch-all mechanism, and is also common practice within the international export control regimes. By enabling broader control than just the listed dual-use items, this mechanism is important for the effectiveness of the export control regime.

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 products 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.

General licences

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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 products 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 Kingdom (England, Northern Ireland, Scotland, Wales). There are also an additional seven EU general licences (EU002–EU008).

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. As a result of the revision 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 on 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 supplies controlled products subject to supervision by the ISP. This includes sales within and outside Sweden.

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 weapons of mass destruction; for a military end-use in a country covered by a weapons embargo; or may be used as components for military equipment that has been exported from the EU without 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.

3.3 Restrictive measures (sanctions) in respect of dual-use items

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 aim is that the person or entity targeted by the sanctions should change their behaviours such as ceasing 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 often target these strategic items is because they are often used in 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, export controls of dual-use items are based mainly on the security policy interests of the exporting country in relation to the intended recipient or the end-user. How significant the export is to national security is a major factor in this assessment. The regulations governing export controls of military equipment and dual-use items contain conditions that permit the risks of violations of international humanitarian law and human rights to be taken into account in the licence application process. There is a connection between the 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

The EU's nuclear technology-related sanctions against Iran, which were lifted in 2016 in accordance with the Joint Comprehensive Plan of Action (JCPOA), were reinstated on 18 October 2025. The USA unilaterally withdrew from the JCPOA in 2018. Iran began to gradually deviate from its commitments under the JCPOA in 2019 and subsequent years, including through increased uranium enrichment and reduced cooperation with the International Atomic Energy Agency (IAEA). In 2024 and 2025, Iran's nuclear capabilities increased further. Despite continued diplomatic efforts, there was no breakthrough in the negotiations with Iran, at which point the E3 (UK, Germany and France) notified the UN Security Council on 28 August 2025 that the 'snapback' mechanism in Security Council Resolution 2231 had been triggered. As the Security Council did not agree on a Resolution that would have stopped the reintroduction of sanctions, the 'snapback' process was implemented, and previous resolutions and their associated sanction regimes were reinstated from 18 October 2025. The EU regards Iran as non-compliant with the JCPOA, and all nuclear technology-related sanctions suspended in 2016 are now again in force, including those mandated by the UN and those autonomously imposed by the EU.

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.

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In connection with the fall of the al-Assad regime in 2024, the EU suspended a number of restrictive measures against Syria. However, the export of certain dual-use items to the country remains prohibited or subject to licence requirements.

In light of Belarus' support for Russia's full-scale invasion of Ukraine, the EU has extended the restrictive measures against Belarus related to the export of dual-use items. In 2025, the EU expanded its sanctions against the country due to the regime's continued support for Russia's aggression and with the aim of preventing evasions of the sanctions.

3.4 Increased sanctions against Russia in 2025 related to dual-use items

The EU's restrictive measures (sanctions) against Russia are of such a comprehensive nature and importance that they deserve their own section. The sanctions already decided in 2014 as a result of Russia's illegal annexation of Crimea and Russia's aggression towards Ukraine have been greatly expanded during the year 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. The prohibitions also cover the export of a comprehensive range 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. The prohibitions also apply to the provision of technical assistance for these categories of items.

During 2025, the EU has continually expanded and tightened the sanctions as part of the 16th, 17th, 18th and 19th sanctions packages. This year's four sanctions packages extended the prohibition on the exports of items that could contribute to the Russian defence and security sector and also expanded the list of entities subject to stricter export restrictions.

There is a limited possibility of exemptions concerning exports for non-military use and for a non-military end-user, and where intended for humanitarian or medical purposes, maritime safety, etc.

3.5 Cooperation within international export regimes

To strengthen international cooperation for 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, 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 Annex 1 and thus become legally binding. Participation in these regimes also makes it easier to meet the legally binding international commitments in the above-mentioned international agreements to refrain from assisting other states, either 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 regime's control lists were updated in 2025 at the 40th plenary meeting held in Sydney, Australia, to commemorate the anniversary.

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. The MTCR currently 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, no plenary meeting was held in 2025.

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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). The NSG currently has 48 participating states, including all EU Member States and the officially recognised of nuclear-weapon States parties under the Treaty on the Non-Proliferation of Nuclear Weapons (NPT). The regime's control lists are updated annually at plenary meetings. The plenary meeting host is the outgoing Chair. The 2025 plenary meeting took place in Cape Town under South Africa's Chairship. Argentina was elected as the new Chair for the period 2025–2026.

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 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 items 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 2025 plenary meeting, further listing proposals could be approved.

The Zangger Committee

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 Nuclear Suppliers Group, 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.

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.

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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 determined within the export control regimes. 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 (WPDU)

In 2025, the WPDU's activities were marked by the White Paper on export controls for dual-use items 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.

In accordance with the Council's conclusions on the White Paper of 30 May 2024, the White Paper's proposals were processed in the WPDU. The EU's export control list was expanded to include products blocked from decision under the multilateral export control regimes by a delegated act of the European Commission in September 2025.

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.

Dual-Use Coordination Group

The 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

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 requires that all States establish effective national controls on export, transit, transshipment and re-export of such items. 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 products 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 commitments.

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 exit and 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. The ISP also has supervisory duties in relation to special prohibiting regulations issued by the Government with the support of the Act (2025:327) on International Sanctions.

The authority's responsibilities are set out in the Ordinance (2010:1101) with instructions for the Inspectorate of Strategic Products. The instruction 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 preliminary decisions 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 a product should be considered a dual-use item. When a company is unsure whether its item belongs to the controlled items category, the company can submit an enquiry to the ISP.

In its supervisory role, the ISP carries out compliance visits to companies and authorities to monitor their internal export control organisations. In 2025, the ISP carried out 50 compliance visits at companies operating in the dual-use items and military equipment areas.

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 products covered by the Act Concerning Inspections in Accordance with the UN Convention on the Prohibition of Chemical Weapons (1994:118).

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.

The Director-General of the ISP is responsible for selecting those cases for consultation with the Export Control Council. Consultation can take place, for example, before a preliminary decision 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.

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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 preliminary decisions that have been ruled upon. With effect from 2005, the ISP also reports all decisions concerning exports and preliminary decisions concerning dual-use items in the ECC area. 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 concluded. 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. During 2025, five ECC meetings were held. The Council dealt with six matters for consultation. All of these concerned military equipment.

In 2025, the members of the Export Control Council were:

- Johan Andersson, Member of the Riksdag (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 Gustafsson, Member of the Riksdag (Left Party)
- Kerstin Lundgren, Member of the 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) (until 5 June)
- Gulan Avci Member of the Riksdag (Liberal Party) (from 5 June)

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 2025.

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 two meetings in 2025.

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.

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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 Act (1984:3) on Nuclear Activities and Ordinance (1984:14) on Nuclear Activities. 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 International Atomic Energy Agency'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 products 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 products 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 Act (1984:3) on Nuclear Activity and Ordinance on Nuclear Activities. 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 in the 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 I, Category 0 of the Dual-Use Regulation.

During 2025, the SSM dealt with 130 applications received concerning exports or transfers within the EU, and decided on export licences in 118 cases. Details of the export licences granted by the SSM in 2025 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. Seven supervisions were carried out in 2025.

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 create 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 2025 are presented in Annex 1 and exports of dual-use items in Annex 2.

Exports of Military Equipment

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 the 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.

The EU's Common Military List has been supplemented in Sweden's list of military equipment 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.

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 therefore.
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.

Category	Equipment
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 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 therefore.
ML16	Forgings, castings and other unfinished products, the use of which in a specified product is identifiable by material composition, geometry or function, and which are specially designed for any products specified by ML1–4, ML6, ML9, ML10, ML12 or ML19.
ML17	Miscellaneous equipment, materials and “libraries”, and components specially designed for these.
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”.

A 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 activities related to 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.

Swedish defence industry

In 2025, manufacturing or supplier licences were held by 559 Swedish companies, authorities and private individuals. The number of licence holders has more than tripled since the current legislation entered into force in 2018. The increase relates principally to subcontractors of system manufacturers of military equipment.

Among the licence holders, 94 exported military equipment or technical assistance, while 277 only supplied military equipment within the country. 188 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 2021–2025 (SEK million)¹

	2021	2022	2023	2024	2025
Total value	35,346	29,407	35,518	46,967	52,110

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 2025²

Companies	Value	Principal area of equipment
Saab AB	SEK 14,188,439,846	Combat aircraft, radar systems, etc.
Saab Dynamics AB	SEK 9,431,470,814	Missile and ground combat systems
Swedish Defence Materiel Administration (FMV)	SEK 5,137,263,208	Leasing of combat aircraft
BAE Systems Hägglunds AB	SEK 3,492,550,424	Tracked vehicles and armoured vehicles
Nammo Sweden AB	SEK 1,950,881,634	Ammunition
BAE Systems Bofors AB	SEK 1,712,755,952	Artillery systems

Companies	Value	Principal area of equipment
Saab Kockums AB	SEK 1,543,218,000	Surface and submarine craft
EURENCO Bofors AB	SEK 1,138,588,837	Gunpowder and explosives
FFV Ordnance AB	SEK 1,014,238,477	Ground combat systems
Scania CV AB	SEK 968,229,847	Ground vehicles
GKN Aerospace Sweden AB	SEK 836,625,304	Maintenance of aero-engines
Norma Precision AB	SEK 759,063,695	Small-calibre ammunition
Aimpoint AB	SEK 564,594,881	Weapon sights
Saab Barracuda AB	SEK 530,024,625	Camouflage products
PartnerTech Karlskoga AB	SEK 526,091,418	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 for exporting military equipment is made up of several parts. This compilation of statistics presents marketing and preliminary decisions, 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. The ISP endeavours as far as possible to extend export controls, that is, to follow the Swedish military equipment, 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 products 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 preliminary decisions

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 a preliminary decision 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 a preliminary decision 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 preliminary decision has already been made.

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

Table 4 **Number of written preliminary decisions made concerning military equipment in 2021–2025**

Type of case	2021	2022	2023	2024	2025
Preliminary decisions	18	18	24	19	17

In 2025, a total of 17 preliminary decisions were issued for 36 countries outside the established circle of recipient countries. Of these, 14 were positive and three negative.

Tender notifications

No later than four weeks before a binding tender for 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 the submission of the tender, 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 contract

transactions which, for example, would conflict with 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 2021–2025

Type of case	2021	2022	2023	2024	2025
Tender notification	255	346	440	500	509
General exemption	26	25	19	22	27
Total	281	371	459	522	536

In 2025, the ISP was notified of 509 tenders to a party abroad. A total of 541 tender cases were decided during the year and in 491 of these cases the notification was submitted without any action being taken. These cases concerned a total of 70 countries and four international organisation. A prohibition on submitting a tender was issued in one case concerning one country. All the other decisions were decisions not to proceed with the case.

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 a preliminary decision, 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 permit export to multiple recipients in multiple countries of an unspecified quantity of military equipment. 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 2021–2025

Type of licence	2021	2022	2023	2024	2025
Individual	589	602	659	814	808
Global	449	492	606	659	723
Transit	47	73	46	55	67
Total	1,085	1,167	1,311	1,528	1,598

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 2021–2025 (SEK million)

Category of equipment	2021	2022	2023	2024	2025
Military equipment for combat purposes	3,735 (-48)	16,454 (+340)	19,512 (+19)	35,013 (+79)	29,663 (-15)
Other military equipment	10,925 (+40)	5,462 (-50)	8,864 (+62)	15,538 (+75)	17,085 (+10)
Total	14,660 (-1.9)	21,915 (+49)	28,376 (+29)	50,551 (+78)	46,747 (-7.5)

Table 8 shows the individual and global export licences issued in 2025 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 applied to. 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 2025**

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Annex I

Country	Number of licences	Categories of military equipment	MEC/OME	Value of licences
EU				
Belgium	11	1,2,3,5,10,11,17,18,21,22	MEC, OME	85,412,350
Bulgaria	3	1,3,5	MEC, OME	3,700,000
Cyprus	1	1	OME	0
Denmark	47	1,2,3,5,6,10,11,13,14,17,18,21,22	MEC, OME	1,280,620,220
Estonia	13	1,3,5,6,9,14,17,21,22	MEC, OME	222,203,292
Finland	47	1,2,3,4,5,6,7,8,9,11,14,15,17,18,21,22	MEC, OME	541,922,312
France	67	1,2,3,4,5,6,8,10,11,14,17,21,22	MEC, OME	1,640,313,713
Greece	6	1,3,14,21,22	OME	645,316
Ireland	4	1,3,13,22	OME	6,608,241
Italy	24	1,2,3,5,7,8,9,11,14,17,21,22	MEC, OME	120,487,254
Croatia	2	1,3,8	MEC, OME	7,585,200
Latvia	14	1,2,3,5,14,17,18,21,22	MEC, OME	434,497,885
Lithuania	18	1,2,3,4,5,13,14,17,18,21,22	MEC, OME	1,445,947,989
Luxembourg	4	1,4,17	OME	60,778
Malta	2	1,3,8	MEC, OME	230,000
Netherlands	30	1,2,3,4,5,6,7,8,9,11,13,14,15,17,18,21,22	MEC, OME	1,913,707,331
Poland	34	1,2,3,4,5,6,8,11,13,17,21,22	MEC, OME	662,899,998
Portugal	6	1,2,17,18,21,22	OME	78,000
Romania	4	1,3,11	OME	86,388
Slovakia	18	1,3,5,6,13,17,22	MEC, OME	2,306,014,214
Slovenia	1	1	OME	0
Spain	34	1,3,4,5,6,8,9,11,17,21,22	MEC, OME	317,036,239

Country	Number of licences	Categories of military equipment	MEC/OME	Value of licences
Sweden	9	2,4,6,13,22	OME	1,840,365
Czech Republic	22	1,3,4,5,6,10,13,14,15,17,18,21,22	MEC, OME	980,733,242
Germany	96	1,2,3,4,5,6,8,9,11,13,14,15,17,18,21,22	MEC, OME	15,592,710,139
Hungary	12	1,3,4,5,8,10,14,15,17,18,21,22	MEC, OME	217,362,460
Austria	12	1,3,5,6,8,17,22	MEC, OME	34,170,690
Total	502			27,816,873,616
REST OF EUROPE				
Iceland	4	3,17	OME	117,585
Montenegro	1	11	OME	730,000
North Macedonia	1	5	OME	1,007,400
Norway	72	1,2,3,4,5,8,10,11,13,17,18,21,22	MEC, OME	1,084,273,570
Switzerland	14	1,2,3,4,5,6,7,8,10,11,13,14,15,17,21,22	MEC, OME	19,276,250
United Kingdom	78	1,2,3,4,5,6,8,9,10,11,13,14,16,17,18,21,22	MEC, OME	865,468,534
Türkiye	6	10,13,22	OME	85,600,000
Ukraine	24	2,3,4,5,6,7,11,13,17,18,21,22	MEC, OME	864,934,561
Total	199			2,921,407,900
NORTH AMERICA				
Canada	22	2,3,5,6,8,9,11,13,14,17,21,22	MEC, OME	454,358,111
USA	94	1,2,3,4,5,6,8,10,11,13,14,15,17,18,21,22	MEC, OME	9,376,555,822
Total	116			9,830,913,933
CENTRAL AMERICA				
Mexico	2	13	OME	1,882,000

Country	Number of licences	Categories of military equipment	MEC/OME	Value of licences
Total	2			1,882,000

SOUTH AMERICA

Argentina	1	4,5,17,18,21,22	MEC, OME	0
Brazil	7	4,5,8,10,14,22	MEC, OME	34,263,199
Chile	2	14	OME	1,200,000
Colombia	1	11	OME	75,000
Peru	2	9.22	MEC, OME	31,000,000
Total	13			66,538,199

NORTHEAST ASIA

Japan	24	2,3,5,14,17,18,21,22	MEC, OME	457,601,185
South Korea	14	2,4,5,7,8,11,14,21,22	MEC, OME	35,687,117
Total	38			493,288,302

SOUTHEAST ASIA

Indonesia	1	2,18,21,22	OME	0
Malaysia	3	2,3,11,18,21,22	MEC, OME	538,991,000
Singapore	14	4,5,8,9,11,14,21,22	MEC, OME	859,652,376
Thailand	7	4,5,6,9,10,11,14,15,17,21,22	MEC, OME	1,912,350,000
Total	25			3,310,993,376

SOUTH ASIA

India	8	2,4,5,13,17,22	OME	24,771,400
Pakistan	1	5.22	OME	0
Total	9			24,771,400

MIDDLE EAST

Bahrain	1	5,15,21	OME	0
United Arab Emirates	7	2,5,11,18,21,22	OME	239,050,000
Kuwait	1	4,21,22	OME	0

Country	Number of licences	Categories of military equipment	MEC/OME	Value of licences
Oman	1	5,15,18,21,22	MEC, OME	0
Qatar	1	11	OME	9,500,000
Saudi Arabia	2	4,5,10,11,21,22	OME	0
Total	13			248,550,000
NORTH AFRICA				
Algeria	1	5,21,22	MEC, OME	0
Tunisia	1	4,5,18,21,22	OME	0
Total	2			0
REST OF AFRICA				
Botswana	1	2	OME	0
South Africa	12	4,5,6,10,11,14,15,21,22	OME	19,933,830
Total	13			19,933,830
OCEANIA				
Australia	21	2,3,4,5,9,10,11,14,17,21,22	MEC, OME	2,006,037,898
New Zealand	4	1,2,3,14,22	MEC, OME	6,243,236
Total	25			2,012,281,134
TOTAL	951			46,747,433,690

On donations of military equipment to Ukraine in particular

Tables 6–8 show export licences for the sale of military equipment. Additionally during 2025, 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 equipment covered by the licences at aggregated level. The total number of such licences in 2025 was 47, which was a slight decrease compared to the 52 licences issued in 2024.

Table 9 **Granted licences for donation of military equipment to Ukraine 2025**

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Country	Number	Categories of equipment
Ukraine	47	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, ML9/MEC, ML9/OME, ML10/OME, ML11/OME, ML13/OME, ML14/OME, ML15/OME, ML17/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 export licence may relate to both a follow-on delivery and international cooperation.

Table 10 Detailed description of granted export licences for sale of military equipment to certain countries in 2025

Country	Total number of licences granted	Of which follow-on deliveries	Of which international cooperation	Categories of equipment – new deals
Algeria	1	1	1	
Argentina	1	1	0	
Bahrain	1	1	0	
Botswana	1	1	0	
Chile	2	2	0	
Colombia	1	0	1	ML11
UAE	7	7	0	
India	8	8	0	
Indonesia	1	1	0	
Kuwait	1	1	1	
Malaysia	3	3	1	
Mexico	2	1	0	ML13
Oman	1	1	1	
Pakistan	1	1	0	
Peru	2	2	0	
Qatar	1	1	0	
Saudi Arabia	2	2	1	
Singapore	14	14	1	
Thailand	7	7	1	
Tunisia	1	1		
Türkiye	6	2	2	ML10, ML13, ML22
24		22	19	ML3
Total	88	80	29	

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 2025.

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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 2025.

Table 12 Notification of use of general licences concerning export of military equipment in 2025

	TFS 2012:7	TFS 2012:8	TFS 2021:2
Number of notifications	4	3	7

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	24	14	29	14	16	35

Denials

The Swedish export control system, with its mandatory reporting of marketing abroad and the opportunity for written preliminary decisions, 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 2025, the ISP decided on a total of 1 formal denial. Formal denial means 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 decision notifications per country in 2025

Country	Number of licences denied
Vietnam	1
Total	1

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

Table 15 Number of denial notifications per country by period since 2006

2006–2010	Number	2011–2015	Number	2016–2020	Number	2021–2025	Number
Argentina	2	Saudi Arabia	8	Türkiye	23	Vietnam	3
Libya	2	UAE	7	UAE	8	Bahrain	2
Russia	2	Egypt	6	Saudi Arabia	8	Qatar	2
Algeria	1	Colombia	4	Qatar	7	Saudi Arabia	2
Azerbaijan	1	Pakistan	4	Philippines	6	Taiwan	2
Bangladesh	1	Vietnam	4	Taiwan	5	Bangladesh	1
UAE	1	Bahrain	3	Bangladesh	4	Bosnia and Herz.	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

2006–2010	Number	2011–2015	Number	2016–2020	Number	2021–2025	Number
Ukraine	1	China	2	Pakistan	2	South Africa	1
Total	17	Lebanon	2	Serbia	2	Thailand	1
		Russia	2	Armenia	1	Tunisia	1
		Serbia	2	Bahrain	1	Türkiye	1
		Thailand	2	Bosnia and Herz.	1	Turkmenistan	1
		Algeria	1	Ecuador	1	Total	24
		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	Total	96		
		Namibia	1				
		Nepal	1				
		Oman	1				
		Paraguay	1				
		Taiwan	1				
		Ukraine	1				
		Total	79				

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 2025. 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 61 countries in 2025.

Table 16 Value of actual exports of military equipment by country in 2025 (SEK)

Country	Categories of military equipment	Value of MEC	Value of OME	Total
EU				
Belgium	1,2,3,5,6,8,10,11,13,17,21,22	22,786,637	121,873,518	144,660,155
Bulgaria	1,3,4,5,8,22	9,412,892	141,643,151	151,056,043
Denmark	1,2,3,5,6,7,8,10,11,13,14,17,22	33,440,516	472,315,682	505,756,198
Estonia	1,2,3,5,6,13,15,17,22	149,694	227,386,473	227,536,167
Finland	1,2,3,4,5,6,7,8,10,11,13,14,17,22	371,894,544	133,096,373	504,990,917
France	1,2,3,4,5,6,8,11,13,14,17,22	392,624,626	756,424,765	1,149,049,391
Greece	3,13,14,21	0	1,095,694	1,095,694
Ireland	1,13,22	0	7,110,173	7,110,173
Italy	3,4,5,8,9,13,14,17,21,22	65,984,105	112,667,688	178,651,793
Croatia	3,13	7,636	6,178,627	6,186,263
Latvia	1,2,3,5,13,17,18,21	195,058,012	175,058,672	370,116,684
Lithuania	1,2,3,4,13,17,22	389,183,515	78,893,568	468,077,083
Luxembourg	17	0	1,752	1,752
Malta	3,8	21,191	16,876	38,067
Netherlands	1,2,3,5,6,7,8,11,13,14,15,17,18,21,22	1,104,649,276	471,780,606	1,576,429,882
Poland	1,2,3,5,6,8,9,10,11,13,14,17,18,21,22	868,347,184	595,728,884	1,464,076,068
Portugal	1,3,17,21,22	9,463,006	8,954,668	18,417,674
Romania	3,5,11,13	0	10,944,253	10,944,253
Slovakia	1,3,13,17	0	21,071,872	21,071,872
Slovenia	1,3,13,22	17,950,326	11,564,771	29,515,097

Country	Categories of military equipment	Value of MEC	Value of OME	Total
Spain	3,4,5,6,8,11,13,17,21	44,978,700	66,037,839	111,016,539
Czech Republic	1,2,3,4,5,6,8,13,14,17,18,22	20,696,610	2,103,002,470	2,123,699,080
Germany	1,2,3,4,5,6,8,9,11,13,14,17,18,21,22	134,153,943	1,356,314,551	1,490,468,494
Hungary	1,3,4,8,10,13,14,17,22	313,722,970	2,185,718,582	2,499,441,552
Austria	1,2,3,5,6,10,13,14,17,22	3,536	54,541,950	54,545,486
Total		3,994,528,919	9,119,423,458	13,113,952,377

REST OF EUROPE

Andorra	3	0	1,041,785	1,041,785
Iceland	1,3,8,10,17	32,338	2,717,738	2,750,076
Montenegro	11	0	119,093	119,093
North Macedonia	5	0	949,978	949,978
Norway	1,2,3,4,5,6,7,8,10,11,13,14,15,17,18,21,22	499,926,749	209,998,530	709,925,279
Switzerland	1,3,5,6,8,10,13,15,17,22	8,181,304	83,714,014	91,895,318
United Kingdom	1,2,3,4,5,6,8,9,11,13,14,16,17,21,22	215,703,751	720,506,732	936,210,483
Türkiye	10,13	0	66,697,802	66,697,802
Ukraine	2,3,4,5,13,17,18,22	687,245,444	85,329,867	772,575,311
Total		1,411,089,586	1,171,075,539	2,582,165,125

NORTH AMERICA

Canada	2,3,4,5,6,8,11,13,14,15,17,21,22	242,405,883	269,099,806	511,505,689
USA	1,2,3,4,5,6,8,10,11,13,14,15,17,18,21,22	2,886,388,880	1,374,051,991	4,260,440,871
Total		3,128,794,763	1,643,151,797	4,771,946,560

CENTRAL AMERICA

Country	Categories of military equipment	Value of MEC	Value of OME	Total
Mexico	13	0	1,958,574	1,958,574
Total		0	1,958,574	1,958,574

SOUTH AMERICA

Argentina	4	92,162,704	0	92,162,704
Brazil	2,3,4,5,10,11,13,14,17,18,21,22	1,495,337,128	700,644,040	2,195,981,168
Chile	14	0	1,517,660	1,517,660
Colombia	11	0	29,582	29,582
Peru	1.9	8,840,602	90,994	8,931,596
Total		1,596,340,434	702,282,276	2,298,622,710

NORTHEAST ASIA

Japan	2,3,4,5,13,14,17	378,443,956	210,493,550	588,937,506
South Korea	4,5,8,10,11,13,14.22	27,308,104	263,588,291	290,896,395
Total		405,752,060	474,081,841	879,833,901

SOUTHEAST ASIA

Malaysia	11,21,22	0	490,504	490,504
Singapore	4,5,7,8,9,11,13,14,21.22	53,977,000	200,168,534	254,145,534
Thailand	4,10,21.22	0	428,516,103	428,516,103
Total		53,977,000	629,175,141	683,152,141

SOUTH ASIA

India	2,3,5,13,14,17,22	796,590,224	248,084,564	1,044,674,788
Pakistan	4,5,10,11,21,22	0	285,163,290	285,163,290
Total		796,590,224	533,247,854	1,329,838,078

MIDDLE EAST

United Arab Emirates	1,5,10.22	0	1,603,420,052	1,603,420,052
Israel ³	5	0	11,569,576	11,569,576

Country	Categories of military equipment	Value of MEC	Value of OME	Total
Kuwait	22	0	1,691,348	1,691,348
Qatar	11	0	3,868,704	3,868,704
Saudi Arabia	2.22	93,191,225	23,304,957	116,496,182
Total		93,191,225	1,643,854,637	1,737,045,862

NORTH AFRICA

Algeria	5	824,775	0	824,775
Tunisia	2,3,14,18,21	85,435,000	28,671,008	114,106,008
Total		86,259,775	28,671,008	114,930,783

REST OF AFRICA

Botswana	3	0	296,072	296,072
South Africa	1,2,3,4,5,6,8,1 0,11,13,18,21, 22	12,686,329	114,960,874	127,647,203
Tanzania	3	0	106,574	106,574
Total		12,686,329	115,363,520	128,049,849

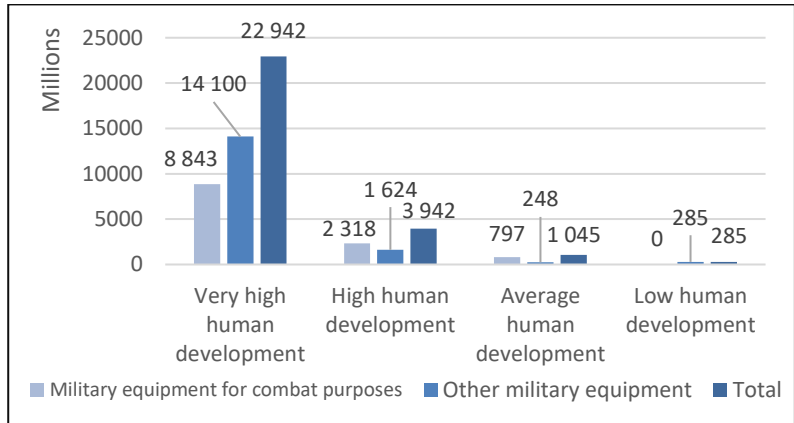
OCEANIA

Australia	2,3,5,8,11,13,1 4,17,21.22	377,637,270	189,287,524	566,924,794
New Zealand	2,3,14.17	0	6,551,516	6,551,516
Total		377,637,270	195,839,040	573,476,310

TOTAL		11 956 847 585	16 258 124 685	28 214 972 270
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³ The exports relate to follow-on deliveries to private companies of components which, at the time of the original export, did not constitute military equipment. The deliveries in 2025 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.

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



*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 2025 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 2025 by region

Region	Percentage
EU	46.5
North America	16.9
Rest of Europe	9.1
South America	8.1
Middle East	6.2
South Asia	4.7
Northeast Asia	3.1
Southeast Asia	2.4
Oceania	2.0
Rest of Africa	0.5
North Africa	0.4
Central America and the Caribbean	0

Table 18 shows actual exports in 2025 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 2025 by category of equipment (SEK)

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Category of equipment	Value of MEC	Value of OME
ML1	0	36,879,774
ML2	2,213,415,796	429,460,339
ML3	3,259,591,969	1,256,791,390
ML4	1,814,041,795	875,791,588
ML5	907,485,407	2,024,578,550
ML6	1,001,026,609	1,087,069,756
ML7	0	19,755,194
ML8	805,331,253	67,580
ML9	406,540,174	59,800,488
ML10	1,549,414,582	2,190,479,600
ML11	-	327,384,468
ML12	0	0
ML13	-	473,894,582
ML14	-	632,720,291
ML15	-	28,227,630
ML16	-	1,768,793
ML17	-	305,680,511
ML18	-	56,806,860
ML19	0	0
ML20	-	0
ML21	-	99,236,085
ML22	-	6,351,731,206

Table 19 shows actual exports of small arms, light weapons and Man-Portable Air Defence Systems (MANPADS). *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 2025 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 use or components for such ammunition were exported to Australia, Denmark, Finland, France, Canada, Latvia, Norway, Poland, Spain, Switzerland, United Kingdom, the Czech Republic, Germany, Ukraine, Hungary and United States.
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, Japan, Latvia, Lithuania, Poland, South Africa, the Czech Republic, Tunisia and the USA. In addition, spare parts, training equipment, components or ammunition for recoilless rifles have also been exported to Australia, Brazil, Denmark, Estonia, Finland, France, India, Japan, Latvia, Lithuania, Norway, New Zealand, Poland Portugal, Slovakia, Slovenia, the UK, South Africa, the Czech Republic, Tunisia, the USA and Austria.
5. Portable anti-tank missile launchers and rocket systems	Anti-tank missile launchers were exported to France, Lithuania and the United States. In addition, spare parts, training weapons or components for anti-tank systems were exported to Belgium, Denmark, Finland, France, Latvia, Lithuania, Norway, the Czech Republic, Germany 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 Argentina, Canada, Lithuania and Ukraine. In addition, spare parts, training equipment or components for MANPADS have been exported to Brazil, Canada, Latvia, Lithuania, Pakistan, Singapore, the Czech Republic and Thailand.

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.

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Table 20 The value of actual exports of military equipment in current prices and annual percentage change 2021–2025 (SEK million)

Category of equipment	2021	2022	2023	2024	2025
Military equipment for combat purposes	3 821 (+10)	6 533 (+71)	6 968 (+7)	9 351 (+34)	11 957 (+27)
Other military equipment	16 267 (+26)	8 722 (-46)	11 049 (+27)	20 084 (+82)	16 258 (- 19)
Total	20 089 (+23)	15 254 (-24)	18 016 (+18)	29 435 (+63)	28 215 (- 4)

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 product 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 2021–2025 (SEK million)

Type of export	2021	2022	2023	2024	2025
Military equipment exports	20,089	15,254	18,016	29,435	28,215
Total exports of goods	1,626,500	1,999,300	2,100,100	2,068,800	2,044,000
Share	1.23%	0.76%	0.86%	1.42%	1.38%

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 1973–2025 (SEK million)

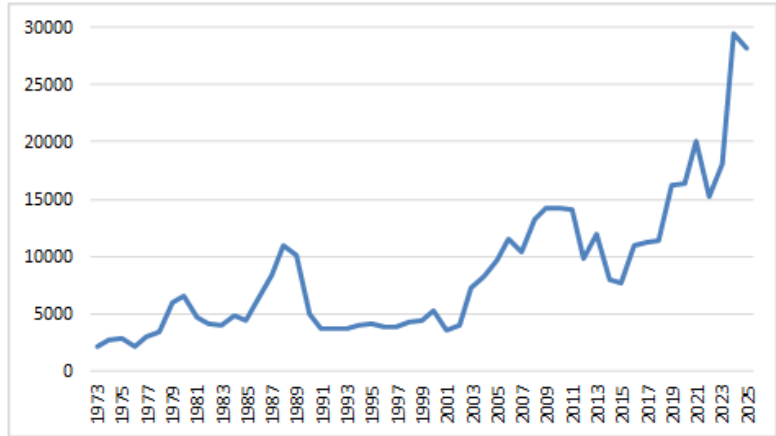


Table 22 shows the value of exports by country over the past three years.

Table 22 The value of actual exports of military equipment by country 2023–2025 (SEK million)

Country	2023	2024	2025
EU			
Belgium	35	71	144
Bulgaria	145	254	151
Denmark	209	215	506
Estonia	104	505	227
Finland	303	521	505
France	532	725	1,149
Greece	4.2	3.1	1.1
Ireland	28	14	7.1
Italy	137	117	179
Croatia	1.8	2.6	6.2
Latvia	129	273	370
Lithuania	173	446	468
Luxembourg	0.2	-	0.002
Malta	-	0.03	0.04
Netherlands	329	956	1,576
Poland	142	1,121	1,464
Portugal	2.1	4.7	18
Romania	5.3	1.8	11
Slovakia	25	68	21
Slovenia	9.4	1.4	30
Spain	62	90	111
Czech Republic	488	789	2,124

Country	2023	2024	2025
Germany	951	2,066	1,490
Hungary	946	2,384	2,499
Austria	17	259	55
Total	4,778	10,887	13,114

REST OF EUROPE

Andorra	1.1	0.6	1
Iceland	2.0	2.6	2.8
Montenegro	-	0.2	0.12
North Macedonia	-	-	0.95
Norway	634	652	710
Switzerland	326	452	92
United Kingdom	1,507	821	936
Türkiye	4.3	32	67
Ukraine	300.1	610	773
Total	2,774	2,570	2,582

NORTH AMERICA

Canada	261	139	512
USA	3,467	4,583	4,260
Total	3,728	4,722	4,771

CENTRAL AMERICA

Mexico	8.0	23	1.9
Total	8.0	23	1.9

SOUTH AMERICA

Argentina	28	-	92
Brazil	2,798	2,569	2,196
Chile	0.6	0.2	1.5
Colombia	-	-	0.03
Peru	0.02	0.1	8.9
Uruguay	0.1	-	-
Total	2,827	2,569	2,299

NORTHEAST ASIA

Japan	27	275	589
South Korea	224	163	291
Total	251	438	880

SOUTHEAST ASIA

Brunei	7.1	0.08	-
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Country	2023	2024	2025
Indonesia	1.1	0.4	-
Malaysia	2.3	89	0.49
Singapore	198	90	254
Thailand	312	353	429
Total	520	532	683

SOUTH ASIA

India	704	917	1,045
Pakistan	1,573	61	285
Total	2,277	978	1,329

MIDDLE EAST

UAE	219	6,153	1,603
Israel ⁴	18	21	12
Kuwait	0.2	-	1.7
Oman	0.3	-	-
Qatar	2.2	0.09	3.9
Saudi Arabia	95	71	116
Total	334	6,245	1,737

NORTH AFRICA

Algeria	-	-	0.82
Tunisia	-	-	114
Total	-	-	115

REST OF AFRICA

Botswana	0.8	1.1	0.29
Namibia	1.1	0.8	-
Nigeria	0.6	-	-
South Africa	163	185	128
Tanzania	0.2	0.3	0.1
Zambia	0.6	0.7	-
Total	166	187	128

OCEANIA

Australia	337	258	567
New Zealand	14	20	6.6
Total	351	278	573

INTERNATIONAL ORGANISATIONS

Country	2023	2024	2025
UN and other international organisations	-	1.8	-
Total	-	1.8	-

TOTAL	18,014	29,431	28,215
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⁴ The exports relate to follow-on deliveries to private companies of components which, at the time of the original export, did not constitute military equipment. The deliveries in 2025 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.

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 1993–2025 (SEK million)

Place	Country	Total
1.	USA	38,979
2.	Brazil	28,815
3.	UAE	23,532
4.	Norway	20,363
5.	Germany	18,251
6.	Netherlands	16,762
7.	India	16,434
8.	Hungary*	16,021
9.	Czech Republic*	14,763
10.	United Kingdom	14,025
11.	South Africa	13,479
12.	Pakistan	13,095
13.	Thailand	12,434
14.	France	12,255
15.	Finland	11,293
16.	Singapore	9,507
17.	Switzerland	8,517
18.	Denmark	8,437
19.	Australia	7,490
20.	Canada	6,000
21.	Saudi Arabia	5,800
22.	South Korea	4,064
23.	Poland	3,546
24.	Austria	3,467
25.	Italy	3,096

	Place	Country	Total
	26.	Japan	3,031
	27.	Greece	2,736
	28.	Estonia	2,427
	29.	Latvia	1,858
	30.	Mexico	1,619

*Including lease payments

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 since 2005 (SEK million)

Place	2010–2014	Value	2015–2019	Value	2020–2024	Value	2025–2029	Value
1.	Thailand	7,967	Brazil	12,308	UAE	17,802	USA	4,260
2.	Saudi Arabia	5,125	Norway	6,431	USA	15,966	Hungary	2,499
3.	USA	4,881	USA	4,469	Brazil	12,518	Brazil	2,195
4.	India	4,361	India	3,774	Germany	6,143	Czech Republic	2,123
5.	United Kingdom	3,741	Hungary*	2,896	Hungary*	6,023	UAE	1,603
6.	Netherlands	3,195	Pakistan	2,722	India	3,444	Netherlands	1,576
7.	Norway	3,022	Czech Republic*	2,688	United Kingdom	3,400	Germany	1,490
8.	Czech Republic*	2,915	Germany	2,529	Czech Republic*	3,335	Poland	1,464
9.	Pakistan	2,832	Netherlands	1,913	Norway	2,966	France	1,149
10.	France	2,481	UAE	1,771	Netherlands	2,741	India	1,044
11.	South Africa	2,318	United Kingdom	1,629	Pakistan	2,618	United Kingdom	936
12.	Canada	2,050	Finland	1,589	France	2,220	Ukraine	772
13.	Germany	2,016	France	1,526	Thailand	1,934	Norway	709
14.	Hungary*	2,001	South Korea	1,476	Switzerland	1,644	Japan	588
15.	UAE	1,943	Thailand	1,198	Australia	1,600	Australia	566
16.	Finland	1,846	Canada	1,171	Finland	1,556	Canada	511

Place	2010– 2014	Value	2015– 2019	Value	2020– 2024	Value	2025– 2029	Value
17.	Australia	1,639	South Africa	1,008	Poland	1,364	Denmark	505
18.	Singapore	1,555	Singapore	933	Estonia	1,192	Finland	504
19.	Denmark	1,256	Denmark	874	Latvia	948	Lithuania	468
20.	South Korea	761	Austria	760	Ukraine	914	Thailand	428
21.	Algeria	738	Australia	696	Denmark	900	Latvia	370
22.	Italy	614	Estonia	646	South Korea	891	South Korea	290
23.	Japan	271	Switzerland	576	Lithuania	816	Pakistan	285
24.	Estonia	266	Italy	536	Japan	754	Singapore	254
25.	Brazil	253	Türkiye	535	Canada	720	Estonia	227
26.	Switzerland	239	Japan	488	Singapore	644	Italy	178
27.	Brunei	221	Poland	422	South Africa	507	Bulgaria	151
28.	Austria	166	Mexico	321	Italy	493	Belgium	144
29.	Poland	141	Saudi Arabia	236	Austria	463	South Africa	127
30.	Spain	130	Latvia	219	Bulgaria	406	Saudi Arabia	116

* 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 equipment or to jointly manufacture military equipment.

In 2025, the ISP approved 19 licences for Swedish companies to enter into agreements involving the granting or transfer of manufacturing rights to parties outside Sweden and 65 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 2025**

Country	Licence agreements	Cooperation agreements
Australia	-	1
Brazil	-	1
Colombia	-	1
Denmark	5	-
EU cooperation: EDF/EDIDP	-	22
EU cooperation: other (EDA)	-	3
Finland	-	4
France	1	2
India	1	-
Indonesia	-	1
Italy	-	1
Canada	1	1
Latvia	-	1
Netherlands	1	7
Norway	1	1
Peru	1	-
Switzerland	-	1
Singapore	-	1
Slovakia	4	-
United Kingdom	-	6
South Korea	-	1
Thailand	-	1
Czech Republic	3	-
Germany	-	5
Ukraine	-	1
Hungary	-	1
USA	1	6

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

2025, 20 companies and one government agency reported a total of 131 licence production agreements. At the same time, 32 companies and four government agencies reported 308 cooperation agreements.

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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 during 2025

Country	Licence agreements	Cooperation agreements
Australia	1	12
Brazil	7	12
Bulgaria	1	-
Colombia	-	1
Denmark	10	3
Estonia	-	4
EU cooperation: EDF/EDIDP	-	87
EU cooperation: other (EDA)	-	17
Finland	4	14
France	4	18
United Arab Emirates	1	3
Greece	1	2
India	7	1
Indonesia	-	1
Italy	-	12
Japan	6	2
Canada	5	12
Latvia	1	1
Netherlands	12	17
Norway	7	18
New Zealand	-	1
Peru	1	-
Poland	1	3
Romania	1	-
Saudi Arabia	-	2
Switzerland	6	6
Singapore	1	4
Slovakia	12	4
Spain	1	8
United Kingdom	7	37
South Africa	1	2

Country	Licence agreements	Cooperation agreements
South Korea	-	2
Thailand	-	1
Czech Republic	24	3
Germany	2	27
Ukraine	-	1
Hungary	-	1
USA	8	26
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 2025, 23 companies reported ownership in 86 foreign legal entities in a total of 32 countries. Table 27 shows the number of foreign legal entities broken down by country in which they operate.

Table 27 Number of reported foreign legal entities broken down by country in 2025

Country	Number of Swedish-owned legal entities
Australia	3
Belgium	2
Brazil	2
Chile	1
Colombia	1
Denmark	2
Finland	4
France	4
United Arab Emirates	3
India	9
Italy	2
Canada	1
Kenya	1
Latvia	1
Malaysia	3
Netherlands	5
Norway	5
Pakistan	1
Poland	1
Saudi Arabia	1

Country	Number of Swedish-owned legal entities
Switzerland	3
Singapore	1
Spain	2
United Kingdom	6
South Africa	2
South Korea	1
Thailand	2
Czech Republic	2
Germany	8
Hungary	1
USA	6
Austria	3
Total	86

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. Two licences for military training were granted in 2025. Both licences concerned the training of Ukrainian citizens.

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 2025 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 2025 broken down by country and type of equipment

From	To	Number	Categories of equipment
Australia	France	1	ML3/OME
Australia	USA	2	ML21/OME, ML22/OME
Belgium	France	1	ML8/MEC

From	To	Number	Categories of equipment
Finland	Finland	2	ML17/OME
Finland	Czech Republic	1	ML21/OME
France	France	1	ML8/MEC
France	Italy	1	ML8/MEC
France	Poland	1	ML8/MEC
France	Switzerland	1	ML8/MEC
Mali	Kenya	1	ML13/OME
Norway	Denmark	1	ML6/OME
Norway	Poland	1	ML8/MEC
Poland	Poland	1	ML4/OME
Switzerland	Italy	1	ML5/OME
United Kingdom	Ireland	8	ML1/OME, ML3/OME
South Africa	Namibia	1	ML1/OME
Czech Republic	Slovakia	1	ML13/OME
Germany	Namibia	1	ML3/OME
Germany	Norway	1	ML22/OME
	Ukraine ⁵	16	ML2/MEC, ML3/MEC, ML4/MEC, ML4/OME, ML5/OME, ML6/OME, ML7/OME, ML9/MEC, ML15/OME, ML17/OME
USA	Italy	1	ML8/MEC
USA	Saudi Arabia	1	ML3/OME
USA	USA	1	ML8/MEC
Total		47	

⁵ Due to foreign affairs secrecy rules in Chapter 15, Section 1 of the Public Access to Information and Secrecy Act (2009:400), 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, which is located abroad to another party abroad, must in individual cases hold a licence from the ISP, known as an individual supplier 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 2025 for supplying military equipment between two parties abroad.

Table 29 Individual supplier licences granted in 2025 broken down by country and category of equipment

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From	To	Number of approvals	Categories of equipment
Afghanistan ⁶	Afghanistan	1	ML6/OME
Belgium	Luxembourg	1	ML6/OME, ML17/OME
Belgium	Norway	3	ML1/MEC, ML6/OME, ML17/OME
Belgium	Poland	2	ML1/MEC, ML1/OME, ML3/OME, ML6/OME, ML17/OME
Belgium	Germany	1	ML5/OME, ML21/OME
Denmark	Germany	1	ML11/OME, ML21/OME
Estonia	Estonia	3	ML1/OME, ML6/OME
Estonia	France	1	ML6/OME
Finland	Denmark	1	ML6/OME
Finland	Poland	1	ML5/OME, ML21/OME, ML22/OME
Finland	Slovakia	1	ML3/MEC
France	Bulgaria	1	ML4/MEC, ML4/OME
France	Denmark	1	ML4/OME
France	France	1	ML6/OME
France	Germany	8	ML4/MEC, ML4/OME, ML5/OME
Iraq ⁷	Germany	1	ML6/OME
Israel	Netherlands	1	ML4/OME
Israel	Norway	1	ML4/MEC
Israel	Slovakia	2	ML4/MEC, ML5/OME
Israel	Germany	1	ML5/MEC, ML11/OME, ML21/OME, ML22/OME
Italy	Brazil	1	ML11/OME
Italy	Estonia	1	ML6/OME
Italy	Ukraine	1	ML17/OME
Canada	Denmark	3	ML3/MEC, ML3/OME
Canada	Norway	1	ML1/MEC, ML1/OME
Canada	Slovakia	1	ML21/OME
Latvia	Denmark	1	ML17/OME
Latvia	Finland	1	ML17/OME
Latvia	France	1	ML17/OME
Latvia	India	2	ML17/OME
Latvia	Netherlands	1	ML17/OME
Netherlands	Denmark	1	ML6/OME
Netherlands	Netherlands	1	ML5/OME

From	To	Number of approvals	Categories of equipment
Netherlands	Norway	1	ML6/OME
Netherlands	Poland	1	ML17/OME
Netherlands	Sweden	1	ML4/MEC
Norway	Estonia	1	ML1/OME
Norway	Norway	1	ML1/OME, ML2/OME, ML6/OME, ML13/OME, ML17/OME
Poland	Denmark	1	ML6/OME
Poland	Poland	1	ML4/MEC
Switzerland	Norway	1	ML2/OME
Switzerland	Slovakia	1	ML3/MEC
Singapore	Türkiye	1	ML22/OME
Slovakia	Norway	1	ML6/OME
Spain	Estonia	2	ML6/OME
Spain	Germany	1	ML11/OME, ML21/OME
United Kingdom	Finland	10	ML5/MEC, ML5/OME, ML9/OME, ML10/OME
United Kingdom	Norway	2	ML4/OME, ML11/OME
United Kingdom	Poland	2	ML5/OME, ML11/OME
United Kingdom	Switzerland	1	ML4/MEC
United Kingdom	Germany	5	ML2/MEC, ML4/OME, ML21/OME
South Africa	Norway	1	ML5/OME
South Africa	Germany	1	ML5/OME, ML21/OME
Czech Republic	Norway	2	ML5/MEC
Czech Republic	United Kingdom	1	ML14/OME
Germany	Belgium	1	ML13/OME
Germany	Denmark	3	ML6/OME
Germany	Estonia	1	ML6/OME
Germany	Norway	7	ML2/OME, ML5/OME, ML6/OME, ML11/OME, ML15/OME
Germany	Poland	3	ML2/MEC, ML2/OME, ML11/OME, ML13/OME, ML22/OME
Germany	United Kingdom	3	ML5/OME
Germany	Germany	8	ML4/MEC, ML4/OME, ML5/OME, ML9/OME, ML11/OME, ML13/OME, ML21/OME
Germany	Ukraine	1	ML21/OME

From	To	Number of approvals	Categories of equipment
USA	Norway	2	ML2/MEC, ML4/OME
USA	United Kingdom	1	ML4/OME
USA	Ukraine	1	ML4/MEC
USA	USA	1	ML18/OME
Total		120	

⁶ Concerned the transfer of armoured passenger cars between European diplomatic missions.

⁷ Concerned the transfer of armoured passenger cars from the German embassy in Baghdad.

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 supply licences in 2025 broken down by country and category of equipment (SEK)

From	To	Categories of equipment	Value
Belgium	Poland	ML1/MEC	9,080,555
Estonia	Estonia	ML6/OME	55,285,218
Finland	Finland	ML6/MEC	131,053,996
Finland	Poland	ML5/OME	5,500,000
France	Norway	ML4/OME, ML5/OME	4,107,732
France	Germany	ML5/OME	41,420
UAE	UAE	ML15/OME	800,000
Canada	Denmark	ML3/MEC, ML3/OME	23,443,450
Canada	Norway	ML1/OME	184,800
Canada	Slovakia	ML21/OME	332,196
Latvia	Denmark	ML17/OME	126,793
Latvia	Finland	ML17/OME	892,442
Latvia	France	ML17/OME	24,991
Latvia	India	ML17/OME	3,112,019
Latvia	Ireland	ML17/OME	4,149
Latvia	Croatia	ML17/OME	22,595
Latvia	Latvia	ML17/OME	11,774
Latvia	Netherlands	ML17/OME	3,683,008
Netherlands	Netherlands	ML5/OME	1,442,822
Norway	Estonia	ML6/OME	3,394,917
Switzerland	Switzerland	ML6/MEC	836,299,000

From	To	Categories of equipment	Value
United Kingdom	Finland	ML4/MEC, ML5/OME, ML9/OME, ML10/OME	401,211,638
United Kingdom	Poland	ML5/OME, ML11/OME	756,974
United Kingdom	United Kingdom	ML4/MEC	559,338,809
Czech Republic	Poland	ML14/OME	23,538,020
Czech Republic	United Kingdom	ML14/OME	2,250,000
Germany	Belgium	ML13/OME	398,000
Germany	Finland	ML4/OME	120 818 14
Germany	Norway	ML4/MEC	36,678
Germany	Poland	ML4/MEC, ML13/OME	25,312,326
Germany	United Kingdom	ML5/OME	34,753,946
Germany	Germany	ML13/OME	168,500
USA	USA	ML17/OME	5,170,890
Total			2,131,779,658

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.

Table 31 **Number of applications concerning exports of civil firearms 2021–2025**

	2021	2022	2023	2024	2025
Export applications	236	211	245	234	228

Table 32 shows the number of licences granted per destination 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 civil firearms 2023–2025 per destination

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Destination	2023	2024	2025
EUROPE			
Andorra	2	1	3
Faroe Islands	-	-	1
Iceland	3	4	10
North Macedonia	-	1	-
Norway	130	107	99
Switzerland	15	20	21
Serbia	-	1	1
United Kingdom	11	21	18
Total	161	155	153
NORTH AMERICA			
Canada	10	7	7
USA	25	28	22
Total	35	35	29
SOUTH AMERICA			
Chile	1	2	1
Peru	-	1	1
Uruguay	-	-	1
Total	1	3	3
NORTHEAST ASIA			
Japan	4	1	3
Total	4	1	3
MIDDLE EAST			
UAE	-	1	1
Lebanon	1	-	-
Total	1	1	1
REST OF AFRICA			
Botswana	2	3	1
Namibia	3	1	3
South Africa	11	15	5
Tanzania	1	2	1
Zambia	1	2	2

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Destination	2023	2024	2025
Total	18	23	12
OCEANIA			
Australia	7	7	5
New Zealand	5	3	7
Total	12	10	12
TOTAL	232	228	213

Transfers within the EU

As a rule, there is free movement of dual-use items within the EU. Licences for the transfer of dual-use items to another EU Member State are required only to a very limited extent according to Annex IV to 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). Assuming that the export of dual-use items follows the geographical distribution of total exports of goods, this means that more than half of the exports from Sweden of dual-use items can take place without a licence as this ought to relate to other EU countries.

Table 33 shows the number of applications for transfer licences to other EU Member States during 2025, divided up by granted and denied applications for licences.

Table 33 Number of processed applications for transfer licences to another EU Member State in 2025

Granted	Denials	Total
54*	0	54

*All granted applications relate to the SSM.

Exports supported by the general licence to Australia, Canada, Iceland, 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 2025 went to Australia, Canada, Iceland, Japan, Liechtenstein, Norway, New Zealand, Switzerland, the United Kingdom and the United States. There is a general licence, which is very extensive in terms of the number of products, 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 2025 and the total number of notifications since its introduction in 2009.

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

Licences	Notifications in 2025	Notifications since introduction in 2009
EU001	31	379

Exports under other general licences

There are seven general licences, which are not particularly extensive in terms of number of products, 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 2025 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 35 Number of notifications of the use of the general licences EU002–EU006

Licences	Notifications in 2025	Notifications since introduction in 2012
EU002	1	11
EU003	0	15
EU004	0	9
EU005	1	6
EU006	0	1

The Dual-Use Regulation has added two 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 that it intends to make use of the licence before the first export.

Table 36 shows the number of exporters who have registered and notified the inspectorate of their use of the general licences EU007 and EU008 during 2025, and the total number of notifications since their introduction.

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

Licences	Registrations and notifications in 2025	Registrations and notifications since their introduction in 2021
EU007	0	5

Licences	Registrations and notifications in 2025	Registrations and notifications since their introduction in 2021
EU008	0	6

Exports supported by individual and global export licences

In the event that none of the general licences EU002–EU006 are applicable, either an individual or a global export licence is required for the export of dual-use items outside the EU.

Tables 37 and 38 show the number of application rulings 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 application rulings 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 2025 concerning dual-use items, broken down by control regime

Control regime	Granted	Denials
Australia Group (AG)	283	1
Missile Technology Control Regime (MTCR)	20	2
Nuclear Suppliers Group (NSG)	193*	3**
The Wassenaar Arrangement (WA)	350	12
Total	846	18

*77 applications were granted by the ISP and 116 by the SSM.

** 1 application was rejected by the ISP and 2 by the SSM.

Table 38 shows applications for export licences concerning products not covered by control through application of Article 4 of the Dual-Use Regulation, the ‘catch-all’ clause. Application of this clause means that products not listed in Annex 1 to the Dual-Use Regulation are to be covered by licence requirements following a decision by the ISP in the individual case. Decisions on licence requirements under the catch-all clause may cover products 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 products intended for a military end-use in countries covered by a weapons embargo, or products 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 rejected applications for export licences in 2025 concerning dual-use items covered by licence requirements under Article 4 (catch-all) of the Dual-Use Regulation

Granted	Denials	Total
6	2	8

Table 39 shows the number of granted and rejected applications for export licences 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 2025 under Council Regulation 267/2012 concerning restrictive measures against Iran

Granted	Denials	Total
45	1	46

Table 40 shows the number of applications decided 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 rulings on cases are presented in this table.

Table 40 Number of application rulings in 2025 under Regulation No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

Granted	Denials	Depreciation and amortisation	Total
1	0	1	2

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 Articles 2(3) and Article 2a(3) of Council Regulation No 833/2014. The provisions mean that the prohibition on the

export of dual-use items and/or items listed in Annex VII to Regulation No 833/2014, or the provision of technical assistance for such items, does not apply to exports or the provision of technical assistance for humanitarian or medical purposes.

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Table 41 **Number of applications received concerning exemptions from prohibitions on exports or on the provision of technical assistance (2025) pursuant to Council Regulation No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine**

Notifications in 2025
0

Table 42 shows the number of granted applications for export licences broken down into nine product 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 2025 concerning dual-use items broken down by product category and broken down into 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>	71	5	76
Category 2 <i>Materials processing</i>	292	5	297
Category 3 <i>Electronics</i>	104	5	109
Category 4 <i>Computers</i>	0	0	0
Category 5 <i>Telecommunications and information security</i>	146	16	162

Categories 1–9 in Annex I	Individual export licences	Global export licences	Total
Category 6 <i>Sensors and lasers</i>	58	4	62
Category 7 <i>Navigation and avionics</i>	1	2	3
Category 8 <i>Naval</i>	6	0	6
Category 9 <i>Aerospace and propulsion</i>	9	2	11

Table 43 shows the number of licences granted in 2025 for the 20 destinations with the most licences. The table covers 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, Iceland, Japan, Liechtenstein, Norway, New Zealand, Switzerland and the United States.

Table 43 Destinations covered by the greatest number of granted export licences for dual-use items in 2025

Country	Number of licences
China	188
India	95
South Korea	68
Brazil	47
Taiwan	44
Singapore	43
Ukraine	41
Türkiye	35
United Arab Emirates	34
South Africa	33
Chile	32
Malaysia	32
Mexico	32
Thailand	32
Qatar	29
Indonesia	28
Peru	27
Saudi Arabia	26
USA	25
Egypt	23

Table 44 shows all denied applications for individual and global licences in 2025 per country. The table also includes denials of applications for the

export of dual-use items subject to a licence requirement under the catch-all clause.

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Table 44 Countries with the greatest number of licence denials concerning dual-use items in 2025

Country	Number of licences denied
China	9
Thailand	2
Vietnam	2
Honduras	1
India	1
Montenegro	1
Oman	1
Russia	1
Saudi Arabia	1
Singapore	1

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 2025

Country	Global export licences	Individual export licences	Final use
Albania	-	1	Naval use
Colombia	-	1	Naval use
United Arab Emirates	1	3	Return after repair, naval use
India	-	6	Naval use, telecommunications, return after repair, testing activities
Kosovo	-	1	Software
Malaysia	-	1	Communication
Mexico	-	2	Transport, protective equipment
Moldova	-	1	Demonstration

Country	Global export licences	Individual export licences	Final use
North Macedonia	-	1	Use in electronic systems
Norway	-	1	Research activities
Oman	-	2	Telecommunications, border surveillance
Qatar	-	2	Telecommunications, naval use
South Korea	-	3	Return after repair, naval use
Saudi Arabia	1	1	Return after repair
Serbia	-	1	Research activities
Singapore	-	3	Return after repair, coast guard, software
United Kingdom	-	4	Research activities, naval use
Thailand	-	2	Telecommunications, naval use
Ukraine	-	3	Software, military use/country domain
Total	2	39	

Table 46 Number of denied applications for export licences concerning dual-use items for military end-users in 2025

Country	Global export licences	Individual export licences	Final use
India	-	1	Testing activities
Oman	-	1	Area surveillance
Thailand	-	2	Border and area surveillance
Total	-	4	

Preliminary decisions concerning exports of dual-use items and provision of technical assistance

The reporting of request rulings for preliminary decisions is broken down into three main categories. The first category concerns the number of request rulings for preliminary decisions 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 request rulings for preliminary decisions for exports of dual-use items not listed in the Annex. The third category concerns the number of request rulings for

preliminary decisions concerning the provision of technical assistance for dual-use items.

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Table 47 shows the number of request rulings for preliminary decisions concerning dual-use items listed in Annex I to the Dual-Use Regulation broken down into positive and negative preliminary decisions. A positive preliminary decision means that the ISP has issued a decision that a licence can be expected in an assessment of an application for an export licence. A negative preliminary decision means that the ISP has issued a decision that a licence cannot be expected in an 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 time. However, a final position is always adopted when an application for an export licence is assessed.

Table 47 **Number of positive and negative preliminary decisions issued in 2025 concerning exports of items controlled in Annex I to the Dual-Use Regulation**

Positive preliminary decisions	Negative preliminary decisions	Total
39	14	53

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

“Decision on licence requirement for exports and positive preliminary decision” means that the ISP has made a decision that items included in the request are covered by a licence requirement under Article 4 of the Dual-Use Regulation, and that the ISP has issued a positive preliminary decision.

“Decision on licence requirement for exports and negative preliminary decision” means that the ISP has made a decision that items included in the request are covered by a licence requirement under Article 4 of the Dual-Use Regulation, and that the ISP has issued a negative preliminary decision

“Decision that an export licence is not required” means that the ISP has made a decision that the items included in the enquiry are not covered by licence requirements under Article 4 of the Dual-Use Regulation.

Table 48 Number of request rulings made in 2025 concerning a licence requirement for exports of dual-use items pursuant to Article 4 (catch-all clause) of the Dual-Use Regulation

Country	Licence requirement and positive preliminary decision	Licence requirement and negative preliminary decisions	Licence requirement and neutral preliminary decision	Not subject to licence requirement	Total
India	-	3	1	-	4
Iran	-	1	-	-	1
Israel	-	-	-	2	2
China	-	1	-	3	4
Russia	-	1	1	-	2
United Kingdom	4	-	-	-	4
South Korea	-	-	1	-	1
Türkiye	-	-	-	1	1
Ukraine	-	-	-	2	2
Total	4	6	3	8	21

Table 49 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 49 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
Belgium	1	1	0B005, 0E001
Brazil	0	1	0A001f, 0A001h, 0C001, 0C002
Chile	0	1	0A001j
Denmark	2*	0	0E001
Finland	5	2	0A001d, 0D001, 0E001
France	4*	3	0A001g, 0A001h, 0D001, 0E001

Recipient country	Number of global licences	Number of individual licences	Item categories
Japan	1	5	0A001d, 0A001f, 0A001h, 0C002, 0D001, 0E001
China	0	2	0B006f
Croatia	1*	0	0E001
Netherlands	1*	0	0E001
Norway	0	14	0C001
Poland	1	0	0D001, 0E001
Romania	1	0	0D001, 0E001
Switzerland	3	1	0A001f, 0A001h, 0C001, 0C002, 0D001, 0E001
Slovakia	2	0	0D001, 0E001
Slovenia	1	0	0D001, 0E001
Spain	5*	9	0A001d, 0A001f, 0A001h, 0D001, 0E001
United Kingdom	2	3	0A001d, 0A001f, 0A001h, 0D001, 0E001
South Africa	0	1	0A001d, 0A001f, 0A001h, 0C001, 0C002
Czech Republic	2	1	0A001f, 0A001h, 0D001, 0E001
Germany	9*	1	0B005, 0D001, 0E001
Hungary	3	0	0D001, 0E001
USA	17*	12	0A001d, 0A001f, 0A001h, 0A001j, 0B005, 0C001, 0C002, 0D001, 0E001

* of which one or more in the framework 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 request rulings in 2025 concerning licence requirements for the provision of technical assistance under Article 8 of the Dual-Use Regulation

Licence requirement and positive preliminary decision	Licence requirement and negative preliminary decision	Not subject to licence requirement	Total
-	-	1	1

Table 51 sets out rulings on inquiries as to whether a licence is required under Article 11.2 of the Dual-Use Regulation for the transfer of dual-use items within the EU. A licence for the transfer of dual-use items may be required where the final destination of the items in question is located outside the EU's customs territory; where a licence is required under Articles 3, 4, 5, 9 or 10 for the export of the items in question to their final destination; or where the items in question are not to undergo any treatment or processing.

Table 51 **Number of rulings on inquiries in 2025 concerning licence requirements for the provision of technical assistance under Article 8 of the Dual-Use Regulation**

Decisions on licence requirements 2025
2

Table 52 **Membership of multilateral export control regimes in 2025**

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
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

Country	ZC	NSG	AG	MTCR	WA
Lithuania	-	X	X	-	X
Luxembourg	X	X	X	X	X
Malta	-	X	X	-	X
Mexico	-	X	X	-	X
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
USA	X	X	X	X	X
Austria	X	X	X	X	X
TOTAL	39	48	43	35	42

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Annex 3 – Significant trends in Swedish and international export controls.

Developments internationally and their impact on export control regimes

Europe and Sweden are facing the most serious security situation since the end of the Second World War. Authoritarian states are trying to strengthen their influence on a global scale by challenging and reshaping the rules-based world order. Russia's full-scale war of aggression against Ukraine has had far-reaching consequences and a greatly deteriorated security situation for Sweden and our neighbourhood.

The Government has identified three key tasks to respond to the deteriorated security situation: to upgrade Sweden's total defence, to fully integrate Sweden into NATO, and to support Ukraine. The ISP has a role to play in achieving these goals through its mission to control the defence industry and high-tech companies.

A troubled world and the serious security situation have meant that export control has taken on a more important role. The ongoing rearmament involves not only an increased military focus on having access to weapons, ammunition and other military equipment, but also on emerging civilian technologies, such as AI, semiconductor and aerospace technologies, which in turn can contribute to a country's defence industry and military capabilities. Sweden's high-tech industry and expertise are attractive to other countries. Here, export controls help to prevent military equipment and items and technologies that are essentially civilian but can be utilised for military purposes from falling into the wrong hands, such as those of antagonistic countries.

In 2025, sanctions against both Iran and Russia were increased, and the possibility of exports were further restricted. The far-reaching sanctions that the EU has imposed against Russia have played an important part in trying to prevent the Russian defence industry from supplying the Russian military with equipment. The task of preventing the leakage of strategic products to Russia permeates all licence application procedures at the ISP, regardless of the end-user country.

Military support to Ukraine

Following approval by the Riksdag, in the period 2022–2025 the Government decided to provide significant military support to Ukraine and on multiple occasions has stated that support to Ukraine is a foreign and security policy priority. Most of this support has required the ISP's authorisation under the Military Equipment Act. In total during 2025, the ISP granted 47 export licences concerning donations of military equipment from Sweden to Ukraine

Furthermore, the ISP granted 24 export licences for direct sales of military equipment from the Swedish defence industry to Ukraine during 2025. Additionally on 16 occasions during the year, the ISP has allowed

other countries that possess military equipment manufactured in Sweden to donate the equipment to Ukraine. All the cases received during the year concerning support to Ukraine have been high priority for the ISP. For the most part, Swedish military support and the further transfers concerned ground combat and air defence systems.

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The trend in export controls – arms build-up and internationalisation

In recent years, developments in the international environment have led to many countries around the world beginning a substantial build-up of their armed forces. In Sweden, the Government has decided on the biggest upgrade of Sweden's total defence since the 1950s.

Importance of the Swedish defence industry

Swedish industry is advanced and often at the forefront of technology. This applies to the defence industry, which develops, manufactures and sells military equipment, as well to industries that manufacture, develop and sell items covered by the dual-use items regulatory framework. Dual-use items and technology produced by this industry are, as mentioned, highly sought after, not only for civilian use but also for military use.

The defence industry is crucial for the rearmament of Sweden and Europe and for support to Ukraine. In light of this and following the approval of the Riksdag, the Government published a new defence industry strategy in 2025. The goal of the strategy is to strengthen the defence industry base with a focus on faster innovation, increased production and better collaboration. A strong defence industry not only contributes to Sweden's defence but also makes Sweden attractive as a partner and helps to strengthen our security relationships within the EU and NATO as well as with other countries. In the strategy, the Government states that the Swedish defence industry needs to grow and continue to develop its innovative expertise and competitiveness, including in small and medium-sized enterprises and non-traditional defence suppliers.

Over the past ten years, the number of holders of licences to manufacture and/or supply military equipment has more than tripled. In 2025, the number of license holders amounted to 559, which is an increase of approximately 25% compared to the previous year.

During 2025, the Swedish defence industry continued to receive extensive orders, from within Sweden as well as from countries abroad. In 2025, the ISP granted export licences to a value of close to SEK 47 billion. Based on the orders received so far by the Swedish defence industry, the EU and NATO and other partner countries will continue to make up the majority of the Swedish defence industry's export market during the next decade. The ISP estimates that the large number of orders to the Swedish defence industry will continue over a longer period of time.

Defence industry exports are a significant aid in the rearmament that is taking place in Sweden and among our allies and partner countries. In light of Sweden's membership of NATO, the Government has stated that Sweden is to be a credible, reliable and loyal ally. In line with what the

Government has stated, the ISP notes that the significance, in terms of defence and security policy, of Sweden's military equipment exports to and cooperation with other NATO countries has increased.

In addition, the need for a strong and independent defence industry in Sweden and in Europe means an increased focus on cooperation and exchange with European counterparts. In 2025, the ISP granted 25 licences for Swedish government agencies and companies to participate in the projects being pursued within the framework of the European Defence Funds.

Technology, research security and export controls

The combination of rearmament, the internationalisation of both Swedish and foreign defence industries, and the rapid development of emerging technologies, places high demands on export controls.

As an example, 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 antagonistic third countries.

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 entails risks of technology regarded as sensitive in terms of the defence capabilities of Sweden, its allies and close partner countries proliferating.

Research security and responsible internationalisation of research in academia have become increasingly important. Within the context of research security, the ISP conducts outreach activities linked to all of the ISP's core tasks and collaborations with other government agencies.

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 export and other foreign cooperation, approved by the Riksdag (cf. Govt Bill 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 examination of licence applications must also take into account whether the export or collaboration with a foreign country 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 Ordinance), 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 Ordinance.

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 products 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 products 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 supplies controlled products subject to supervision by the ISP. This includes sales within and outside Sweden. A declaration must also be made by those who produce, prepare, consume, import or export chemical precursors (starting substances) that can be used for the manufacture of chemical warfare agents.

Where an exporter ought to be aware of 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 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 under a weapons embargo; or for use as parts or components of military equipment that has been exported from a 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

From the above it follows that a licence may be required under Article 4 of the Dual-Use Regulation for exports of items that are not specified in the annexes to the Regulation (non-listed items) if the exporter has been

informed by the Swedish authorities that the item is or may be intended, in its entirety or in part, for use 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 intended, in its entirety or in part, for uses regulated in Articles 4(1) of the EU Regulation, they are required 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 involves 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 or components for illegally exported military items.

Abbreviations

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Annex 5

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

Ministry for Foreign Affairs

Extract from the minutes of the Government meeting of den 1 April 2026

Present: Minister Svantesson, Chair, and Ministers Edholm, Waltersson Grönvall, Jonson, Strömmer, Forssmed, Tenje, Forssell, Wykman, Kullgren, Liljestrand, Bohlin, Carlson, Rosencrantz, Dousa, Larsson, Britz, Lann

Report submitted by: Minister Dousa

The Government adopts this Communication Strategic Export Controls in 2025 – Military Equipment and Dual-Use Items