

US ITAR Compliance Shipping Issues

Bernadette Peers
Compliance Manager

Issues to Consider When Exporting from *USA*

- Who is the Exporter of Record?
- Who is the Principal Party of Interest?
- Is the Exporter registered with DDTC?
- Do they know what they are doing?
- Is the UK company's Forwarder listed on the licence?

A UK firm is acting here

Issues to Consider When Exporting from *USA*

At Export

- Are the goods controlled?
- Under a licence? Or an exemption?
- Think about export back to USA
- Does anything need to be closed down on its return ?

Issues to Consider When Exporting from *USA*

- TAA Who is covered?
- MLA Who is covered?
- WDA Who is covered?
- Are there any reporting conditions in the above?
- Are there structures in place to record and report back to DOS?

Issues to Consider When Exporting from *USA*

- Are all the relevant parties on the licence/ agreement?
- Do you have control/knowledge re the entry eg Mil End Use, IPR, Temporary Import etc?
- Is an Import licence required? Section 5

Issues to Consider When Exporting from *UK*

- Have you pre alerted your US Customs broker to receive?
- Is he on the licence?
- Does the UK export refer to the US ITAR requirement?
- Do the consignees details match?
- Do you have the correct declaration re UK export laws?

Issues to Consider When Exporting from *UK*

- Is there an increase in value after repair?
- In the case of a SIEL has the licence been decremented?
- Is the agent registered for ITAR and can use the exemptions?
- Has transit been considered?