



THE JOINT INDUSTRY OUTREACH SEMINAR ON STRATEGIC TRADE MANAGEMENT

**Update on Japan's Export Controls
November 2025**

Trade and Economic Security Department
Ministry of Economy, Trade and Industry (METI), Japan

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Japan's Security Export Control system (Overview)

- When advanced items and technologies are passed on to countries and regions that develop Weapons of Mass Destruction and Conventional Weapons, they become an **international threat and can destabilize the international situation.**
- To prevent these problems, export control and technology transaction control are implemented through international export control regimes.
- These controls are exercised based on the "**Foreign Exchange and Foreign Trade Act**".

Carbon Fiber



Export of Goods



Permission System

Regulate exports of goods that disrupt **maintenance of international peace and security**

Blueprints



Transfer of Technology



Permission System

Regulate transfer of technology that disrupts the **maintenance of international peace and security**

Legal Structure under the Law

Regulation of goods export

Regulation of technology transfer

Provide the framework



Act
(FEFTA)

Specify the items
to be controlled



Cabinet Order
(Export Trade Control Order)

Cabinet Order
(Foreign Exchange Order)

Specify the details
of the control items



Ministerial Orders

※FEFTA : Foreign Exchange and Foreign Trade Act



Structure of the List Controls under the Law

■ Legal Structure

1. Law

- ✓ **Foreign Exchange and Foreign Trade Act (FEFTA)**
— Basic framework

2. Cabinet Orders

- ✓ **Export Control Order**
— List of goods
- ✓ **Foreign Exchange Order**
— List of technologies

3. Ministerial Orders

- Details (specifications and interpretations of the listed items)

■ List Controls Structure

Cabinet Order		Regime list
category 1	Weapons	WA/ML
2	Dual-use items	NSG
3		AG
3-2		
4		MTCR
5		WA/BL·SL
~		
13		
14	Others	WA/ML (excluding item 1)
15	Dual-use items	WA/SL
16	Catch-All	Catch-All control

List Control

Catch-All control

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1.1 Update of List Controls

It will be announced on 14th November 2025.

To Follow the agreement in the international export control regimes

1 new item will be added

Equipment for synthesizing peptides will be added.

To Strengthen Export Controls for Advanced Technology

2 new item will be added

High-entropy alloy powders, Semiconductor related item (Field-Programmable Logic Device) will be added.



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Revision of Conventional Weapon Catch-All Controls

- Since Russia's invasion of Ukraine, it has been revealed that Japanese-made items (machine tools, electronic components, etc.) were used for producing conventional weapons.
- In response, METI has decided to review the conventional weapon Catch-All Controls. The new system will require exporters to apply for permission if the item has a high risk of being used in the development of conventional weapons (same system as WMD Catch-All Controls).
- By clarifying the license conditions (end-use and end-user conditions), high-risk transactions will be appropriately managed while considering the burden on exporters.
- METI streamlines the license procedures for exporters supplying the regular armed forces of allied nations (including Singapore), as long as they comply with strict compliance program.

Specific Items

- Machine tools
- Integrated circuits
- Aircraft and parts
- Navigational radio equipment
- Navigational equipment
- Inspection equipment

End-use

end-use conditions

If it is confirmed by the exporter that the items will be used for conventional weapons, a permission application is required.

End-user

end-user conditions

If there are concerns regarding the end-user's background and future prospect related to the development of conventional weapons, a permission application is required.

The government will provide information regarding the end-user.

Transaction terms and forms

Introduction of Catch-All Controls for Group A countries

Even if the transaction is directed towards Group A countries, a system should be established to introduce Catch-All Controls by METI's notice in cases where there are concerns.

To address the increasing concerns for military diversion of dual-use items and technologies, export control authorities should establish an appropriate mechanism for Catch-All Controls.



Group A countries

* Argentina, Australia, Austria, Belgium, Bulgaria, Canada, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Luxembourg, Netherlands, New Zealand, Norway, Poland, Portugal, South Korea, Spain, Sweden, Switzerland, United Kingdom of Great Britain and Northern Ireland, and the United States of America (27 countries in total)

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1.4 Case Study 1: Countermeasures Against Counterfeits ~UAVs~

1. Civilian UAVs are relatively inexpensive and easy to procure, and its use for military purposes, such as C4ISR (Command, Control, Communications, Computers, Intelligence, Surveillance, Reconnaissance) and Targeting is rapidly expanding.
2. Appropriate security trade controls are essential since concerned countries are procuring products sophisticatedly through circumvention.

Examples of Military Adaptation of Small Civilian UAVs

Small Civilian UAVs equipped with an RPG-7 anti-tank rocket launcher



Source: Australian Air Force Aerospace Centre

Attack by UAVs



Source : NHK





1.4 Case Study 1: Countermeasures Against Counterfeits ~UAVs~

For companies to protect themselves...

■ Countermeasures Against Counterfeit Products

- ✓ Assign serial numbers to track primary suppliers
- ✓ Stick hologram seals inside the products
- ✓ Implement undisclosed verification methods, etc.

■ Transaction Review

- ✓ Sudden surge in orders (e.g., Orders exceeding previous logistics capacity)
- ✓ Orders received from countries with no prior business relationship
- ✓ Special instructions requesting anonymizing the shipper/sender info.
(e.g., instructions to avoid indicating shipment origin such as Japan on the outer packaging)

It is crucial to “verify the circumstances” to understand the reason

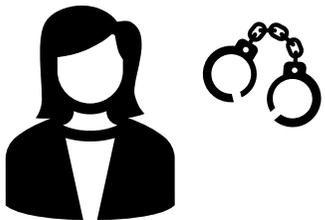




1.4 Case Study 2: Examples of violation cases in Japan

Case A : Lack of internal export control system

“I knew that certain procedures under the FEFTA were needed for exporting goods and services. However, due to the tight delivery time, I exported without obtaining my superior’s approval, deciding it was not subject to regulations...”



There is a problem with the system that allows exports to be conducted based on the PIC (Person in charge)’s discretion without internal approval.

It is essential to establish an export control system to identify and avoid potential risks in advance.



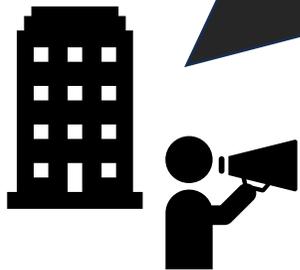


1.4 Case Study 2: Examples of violation cases in Japan

Case B : Believe another company's information unconditionally

“The non-classification certificate from the manufacturer stated that the goods were not subject to export controls, so we exported them as non-controlled items without re-evaluating. Later, it was revealed that the manufacturer had made an error, and the goods were actually controlled items.”

Since the export classification must be conducted under the responsibility of the exporter, it is necessary to re-verify all classification related information obtained from other companies.



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Overview of Japan's Export and Import measures against Russia and Belarus

Export prohibition

- (1) Listed items in the multilateral export control regimes (Russia and Belarus) [Enforced on 18 Mar. 2022]
* Dual-use goods such as machine tools, carbon fibers, high-performance, semiconductors, and their technologies
- (2) Unlisted dual-use items which could be considered for the development of military capacity (Russia and Belarus)
* General Dual-use goods such as semiconductors, computers, telecommunication equipment, and their technologies
[Enforced on 18 March 2022][Items added on 3 Feb. 2023]
- (3) Items related to chemical and biological weapons(Russia) [Enforced on 7 Oct. 2022][Items added on 23 Jan. 2025 (Russia only)]
* Substances for raw materials of chemical weapon agents and Equipment for production of chemical weapon agents and biological agents
- (4) Export prohibition to military-related entities (Russia and Belarus) [Enforced on 18 Mar. 2022,][2 entities were added on 19 Sep. 2025]
* Russian 561 entities such as Ministry of Defense of Russia or Russian aircraft manufacturer, and Belarusian 27 entities
- (5) Export prohibition to military-related entities (countries other than Russia and Belarus) [9 entities were added on 19 Sep. 2025]
* Total 56 entities [UAE 4, AM 1, CN 31, IN 1, KZ 2, KG 2, SY 1, TH 1, TR 10, UZ 3]
- (6) Items related to the development of advanced technology (Russia) [Enforced on 20 May 2022]
* Items such as quantum computers, additive manufacturing equipment, and their technologies
- (7) Items which could contribute to the enhancement of Russian industrial capacities to Russia
* Items such as dump trucks, aircraft engines, automobiles(exceeding 1,900cc),hybrid cars, automotive lubricants, video game consoles machines
[Enforced on 17 Jun. 2022]][Items added on Jan. 17 2025]
- (8) Items related to oil refinery (Russia) [Enforced on 18 March 2022][items added on 20 May 2022]
- (9) Luxury goods (Russia) [Enforced on 5 Apr. 2022]
* Items such as luxury cars, jewelry

Import prohibition

- (10) Certain goods from Russia [Enforced on 19 Apr. 2022][Added on 10 May 2024]
* Alcoholic beverages, woods, crude oil and petroleum products above the price cap, non-industrial diamonds[direct and indirect import]

Export and Import prohibition

- (11) To ban exports and imports bans with the self-proclaimed “Donetsk People's Republic (DPR)” and “Luhansk People's Republic (LPR).” [Enforced on 26 Feb. 2022 (Import) and on 18 Mar. 2022 (Export)]



Additional Sanctions on Russia

(announced on September 12)

- Asset freeze against Russian individuals and entities (14 individuals, 48 organizations)
- Export prohibition on military-related entities (2 entities)
- Measures to prevent the circumvention of sanctions:
 - Export prohibition to 9 entities in third countries other than Russia and Belarus
- Measures against “shadow fleet” (asset freeze: 3 entities)
- Reduction of the oil price cap (from \$60 per barrel to \$47.6 per barrel)



2.2 Sanctions (North Korea)

Measures		Date of Entry into Force	Competent Authority
Trade Restrictions	Ban on all exports to North Korea	June, 2009	METI
	Ban on all imports from North Korea	Oct., 2006	
Financial Restrictions	Ban on the transfer of funds to persons or entities related to North Korea's missile programmes or other WMD programmes	Sep., 2006	MOF (trade-related payment: METI)
	Ban on payment to North Korean residents and foreign entities acting on their behalf (except for the payment of 100,000 yen or less to natural persons)	Feb., 2016	
	Notification required when carrying cash of more than 100,000 yen to North Korea	July, 2010	MOF
Denied Entry	Ban on the entry of North Korean citizens	Oct., 2006	MOJ Ministry of Justice
	Denial of re-entry of foreign crew members and foreign citizens residing in Japan who violated the trade and financial measures against North Korea	June, 2009	
Travel Restrictions	Request to all residents not to visit North Korea	July, 2006	MOFA
Transport Restrictions	Ban on charter flights between Japan and North Korea	July, 2006	MLIT Ministry of Land, Infrastructure, Transport and Tourism
	Ban on the entry of all North Korean flag vessels	Oct., 2006	
Cargo Inspection	Inspection of cargo shipped to or from North Korea deemed to carry items prohibited by the UN resolutions	July, 2010	





2.2 Sanctions (North Korea)

1. **Ban on all exports of goods** destined for NK
2. **Ban on all imports of goods** originating in or shipped from NK
3. To ensure the enforcement of these restrictions, the following transactions shall be banned:
 - i. Transactions involving buying/selling, loaning/borrowing, or giving of goods that involve the movement of the goods between NK and third countries (intermediate trade)
 - ii. Payments of import bills for goods originating in or shipped from NK which are imported without import approval
4. Goods exported for humanitarian purposes are exempt from the above restrictions.

METI has decided to extend the ban for 2 years on all exports destined for North Korea, and all imports originating in or shipped from NK, in line with the “Measures against North Korea Pursuant to the Foreign Exchange and Foreign Trade Act” (decided by the Cabinet on April 8, 2025).





Thank you for your attention.