



THE JOINT INDUSTRY OUTREACH SEMINAR ON STRATEGIC TRADE MANAGEMENT

Updates to Singapore's Strategic Trade Controls

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04 November 2025



01

OVERVIEW OF SINGAPORE'S STRATEGIC TRADE CONTROL

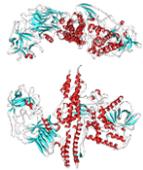




Scope of Strategic Trade Controls

1

Strategic goods, software and technology under the Strategic Goods (Control) Act



2

Trade prohibitions under the Regulation of Imports and Exports Regulations



UN Security Council





What are Strategic Goods?

- Items that can be used for the production, development or use in Nuclear, Chemical or Biological weapons or missiles capable of delivering these weapons.
- Strategic Goods include:
 - Military goods including conventional arms.
 - Dual-use items – both civilian / industrial and military application.
 - Related software and technology.



**United Nations Security Council
Resolution
1540 (2004)**





Strategic Goods Control Legislations

Strategic Goods (Control) Act 2002

Strategic Goods (Control) Regulations (SGCR)

- Fourth Schedule – Transshipment List
- Fifth Schedule – Transit List

149 category codes under the military and dual-use lists

Strategic Goods (Control) Order 2025 (SGCO)

- Military List
- Dual-Use List

Strategic Goods (Control) (Brokering) Order (SGCBO)

- ML 1 – 4 & 8



Permits for Transfer of Strategic Goods

Export of strategic goods and related technology listed in the **Strategic Goods (Control) Order**

Transshipment and **transit** of strategic goods and related technology **not** in the **Fourth** or **Fifth schedule** if they **remain** in the **free trade zone** for **more than 21 days (by air)** and **45 days (by sea)**

Transshipment and **transit** of strategic goods and related technology listed in the **Fourth** and **Fifth schedules** of the **Strategic Goods (Control) Regulations**

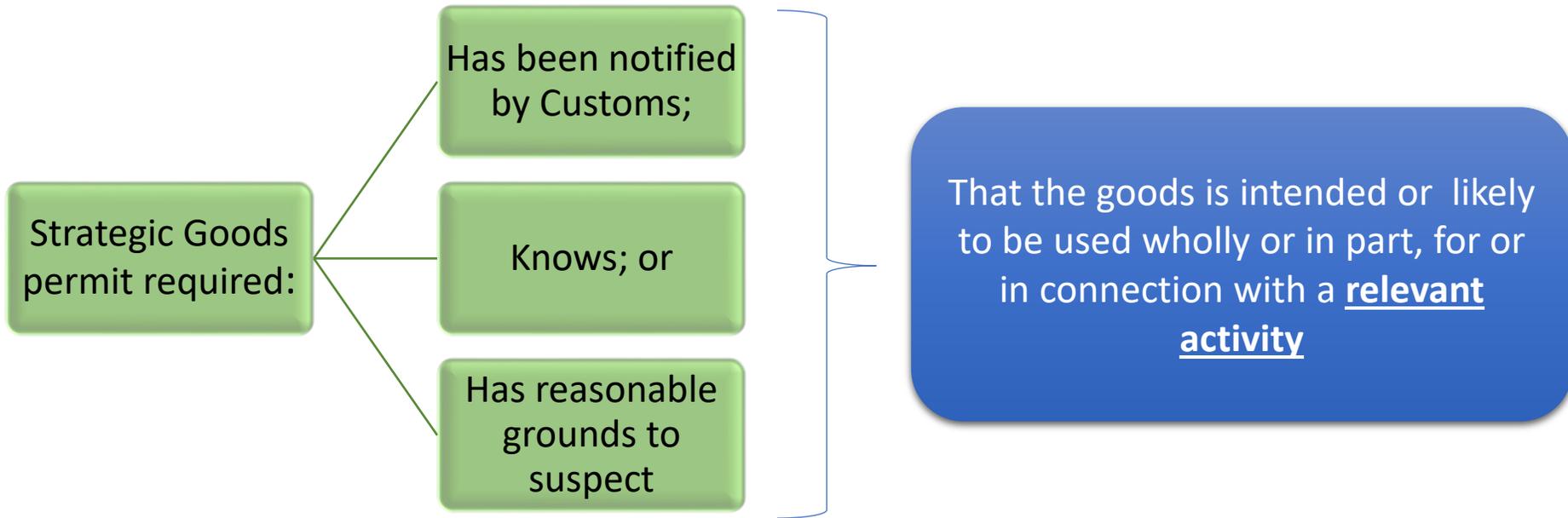
Export, transshipment and **transit** of goods and technology known or suspected to be used for **Weapons of Mass Destruction purposes**
(Relevant Activity)

Transfer of strategic goods without a valid strategic goods permit (Section 5 of the SGCA) shall be guilty of an offence.



Relevant Activity

- (a) The development, production, handling, operation, maintenance, storage, detection, identification or dissemination of any **nuclear, chemical, or biological weapon**; or
- (b) The development, production, maintenance or storage of **missiles** which are capable of delivering any such weapon.





United Nations Security Council Resolutions (UNSCR)

- Customs implements UNSCR trade-related sanctions via the Regulation of Imports and Exports Act 1995 (RIEA) and Regulation of Imports and Exports Regulations (RIER).



- Other agencies' implementation of UNSCR:
 - Monetary Authority of Singapore (Sanctions and Freezing of Assets of Persons – Democratic People's Republic of Korea) Regulations
 - Merchant Shipping Act 1995 and Maritime and Port Authority of Singapore Act 1996
 - United Nations Act 2001 & Regulations
 - Immigration Act 1959

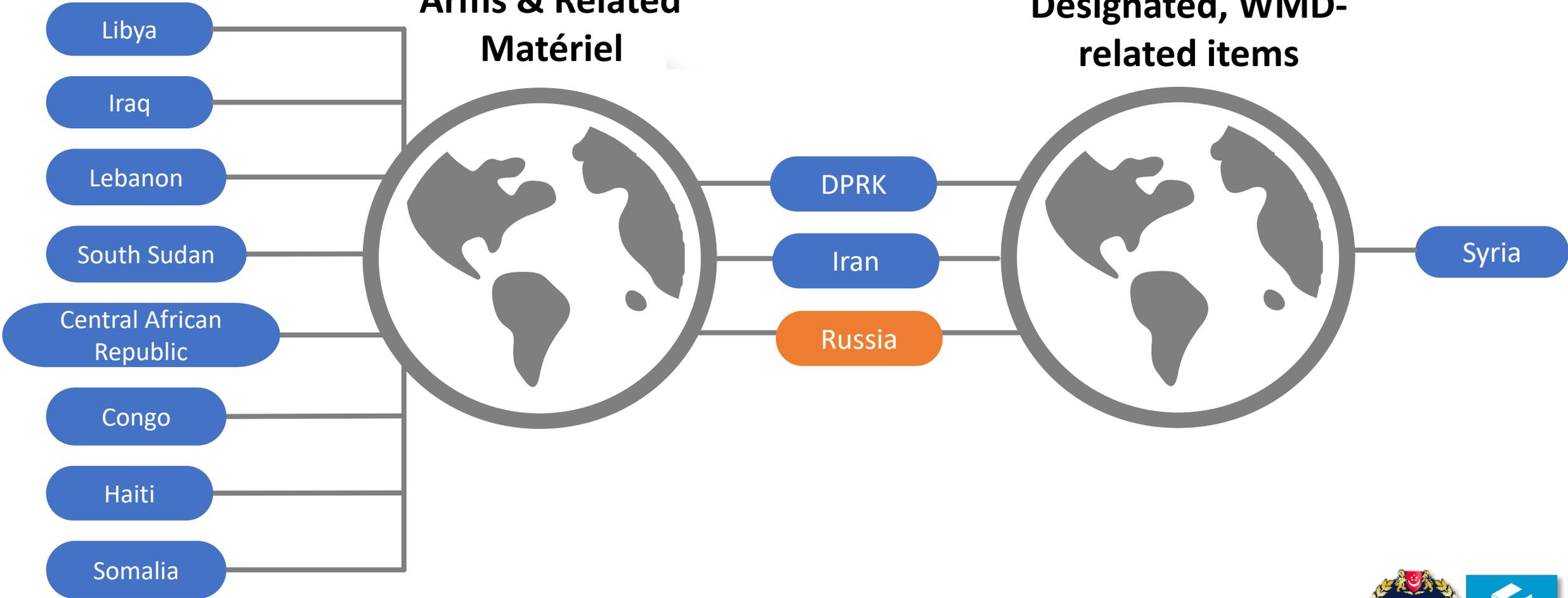




Regulation of Imports and Exports Regulations (RIER)

Arms & Related Matériel

Designated, WMD-related items





Commercial Trade with DPRK Prohibited

- With effect from 8 Nov 2017, Singapore has prohibited **all commercially traded** goods from or to the Democratic People's Republic of Korea (DPRK), including the transshipment and transit of these goods through Singapore.
- *Seventh Schedule of the Regulation of Imports and Exports Regulations:*
“Any goods that are for the purposes of trade with any person in the Democratic People's Republic of Korea (DPRK)” is prohibited from import, export, transshipment and transit.



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UPDATES 2025





Strategic Goods Control Legislations

Strategic Goods (Control) Act 2002

Strategic Goods (Control) Regulations (SGCR)

NEW

- Fourth Schedule – Transshipment List
- Fifth Schedule – Transit List

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Strategic Goods (Control) Order 2025 (SGCO)

NEW

- Military List
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NEW

- ML 1 – 4 & 8

NEW

- SGCO 2025 incorporated the revisions of controls as well as editorial amendments for greater consistency and clarity.
- Amendments were made to the SGCR and SGCBO to update respective references to the new SGCO 2025.



Strategic Goods (Control) Order 2025

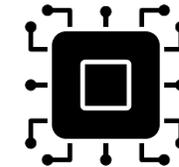
List of Military Goods and Technology



- 2024 Wassenaar Arrangement Munitions List

Strategic Goods (Control) Order 2025

List of Dual-Use Goods and Technology



- 2024 EU Dual-Use List

- Missile Technology Control Regime
- Australia Group
- Nuclear Suppliers Group
- Wassenaar Arrangement

The SGCO aligns the controlled strategic goods and technology, including the parameters, definitions of words and expressions with the Multilateral Export Control Regimes to be in line with international standards





Affected Category Codes in SGCO 2025

List of Military Goods

ML7 • ML8 • ML10 • ML11 • ML18 • ML19

With effect from **1 December 2025**, the SGCO 2025 will come into effect.

The amendments to SGCO 2025 in detail can be found on Customs website (www.customs.gov.sg > Businesses > Strategic Goods Control > Resources).

Cat 0 Cat 1 Cat 2

0B004 • 1A003 • 1A007 • 1A202 • 1A225 • 1B001 •
1B228 • 1C011 • 1C350 • 1C351 • 2B116 • 2B351

Cat 3 Cat 5 Cat 6

3A001 • 3A002 • 3B001 • 3C003 • 3C004 • 5A001 •
5A101 • 5D001 • 5A002 • 6A001 • 6A002 • 6A003 •
6A005 • 6A006 • 6B004 • 6C005 • 6E003

Cat 7 Cat 8 Cat 9

7A • 7A003 • 7A105 • 8A002 • 9A006 • 9A108 •
9A121 • 9B009 • 9B010 • 9B105 • 9B107 • 9C108 •
9D004 • 9E003



<https://go.gov.sg/sgco2025updates>

Amendments to the SGCO 2025





Affected Category Codes in SGC0 2025

3A001

Category Code	SGCO 2024	SGCO 2025
3A001.b.7.a., 3A001.b.7.b., 3A001.b.7.c.2., 3A001.b.7.c.3.	<p>Electronic items as follows:</p> <p>---</p> <p>b. Microwave or millimetre wave items, as follows:</p> <p>---</p> <p>7. Converters and harmonic mixers having any of the following characteristics:</p> <p>a. Designed to extend the frequency range of "signal analysers" beyond 90 GHz;</p> <p>b. Designed to extend the operating range of signal generators as follows:</p> <ol style="list-style-type: none"> 1. Beyond 90 GHz; 2. To an output power greater than 100 mW (20 dBm) anywhere within the frequency range exceeding 43.5 GHz but not exceeding 90 GHz; <p>c. Designed to extend the operating range of network analysers as follows:</p> <p>---</p> <ol style="list-style-type: none"> 2. To an output power greater than 31.62 mW (15 dBm) anywhere within the frequency range exceeding 43.5 GHz but not exceeding 90 GHz; 3. To an output power greater than 1 mW (0 dBm) anywhere within the frequency range exceeding 90 GHz but not exceeding 110 GHz; or 	<p>Electronic items as follows:</p> <p>---</p> <p>b. Microwave or millimetre wave items, as follows:</p> <p>---</p> <p>7. Converters and harmonic mixers having any of the following characteristics:</p> <p>a. Designed to extend the frequency range of "signal analysers" beyond 110 GHz;</p> <p>b. Designed to extend the operating range of signal generators as follows:</p> <ol style="list-style-type: none"> 1. Beyond 110 GHz; 2. To an output power greater than 100 mW (20 dBm) anywhere within the frequency range exceeding 43.5 GHz but not exceeding 110 GHz; <p>c. Designed to extend the operating range of network analysers as follows:</p> <p>---</p> <ol style="list-style-type: none"> 2. To an output power greater than 100 mW (20 dBm) anywhere within the frequency range exceeding 43.5 GHz but not exceeding 110 GHz; 3. Not used; or

ML8

ML8.f. <i>Technical Note</i>	<p>"Energetic materials" and related substances, as follows:</p> <p>---</p> <p>f. "Additives" as follows:</p>	<p>"Energetic materials" and related substances, as follows:</p> <p>---</p> <p>f. "Additives" as follows:</p> <p><i>Technical Note</i></p> <p><i>For the purpose of Category Code ML8.f., 'additives' are substances used in explosive formulations to improve their properties.</i></p>
ML8 Note 1.k.	<p>"Energetic materials" and related substances, as follows:</p> <p>---</p> <p><i>Note 1</i></p> <p><i>Category Code ML8 does not apply to the following substances unless they are compounded or mixed with the "energetic material" specified in Category Code ML8.a. or powdered metals specified in Category Code ML8.c.:</i></p> <p>---</p> <p>k. <i>N-pyrrolidinone; 1-methyl-2-pyrrolidinone (872-50-4);</i></p>	<p>"Energetic materials" and related substances, as follows:</p> <p>---</p> <p><i>Note 1</i></p> <p><i>Category Code ML8 does not apply to the following substances unless they are compounded or mixed with the "energetic material" specified in Category Code ML8.a. or powdered metals specified in Category Code ML8.c.:</i></p> <p>---</p> <p>k. <i>1-methyl-2-pyrrolidinone (N-methyl-2-pyrrolidinone) (872-50-4);</i></p>



03

DUE DILIGENCE





Importance on Due-Diligence and Transparency

1

All companies operating in Singapore must conduct their activities transparently and in full compliance with applicable laws and regulations.

2

Businesses should remain informed of and take into account the implications of other countries' export controls on their international business activities.

3

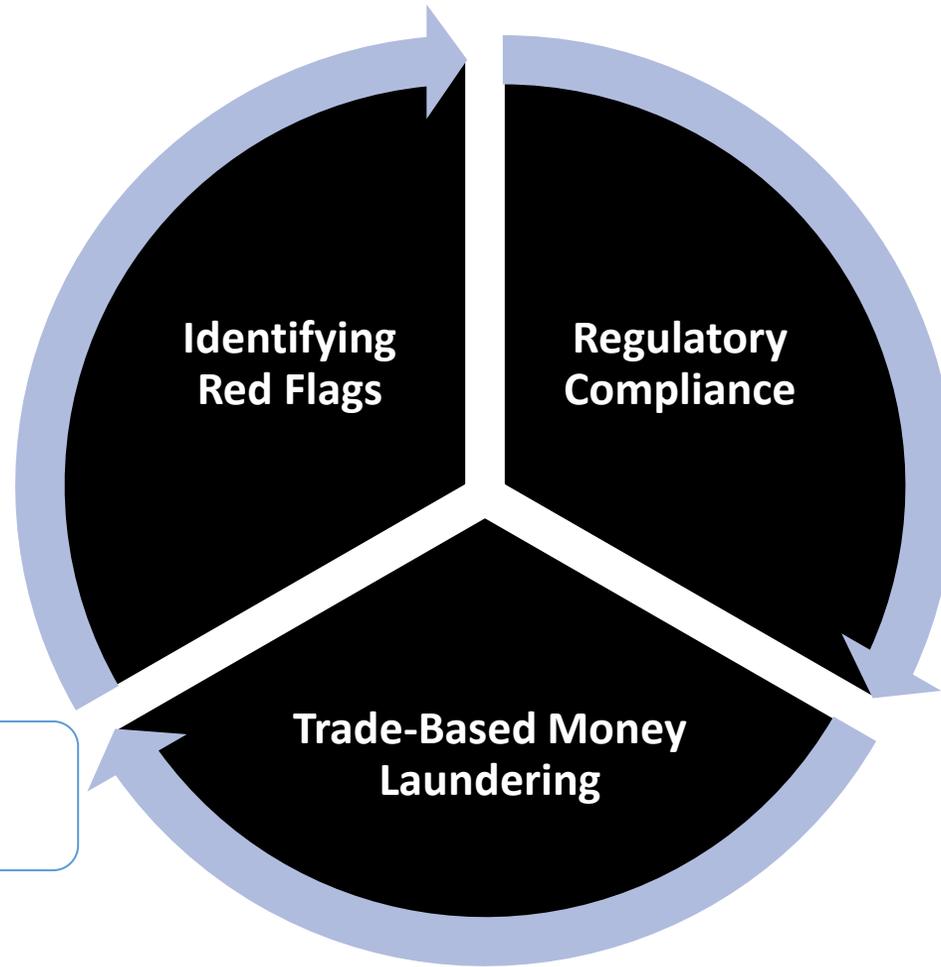
Businesses should not use their association with Singapore to circumvent or violate the export controls of other countries. This applies to all our trading partners.

4

Engaging in illicit practices can lead to legal, operational and reputational consequences.



Importance on Due-Diligence and Transparency



- Conduct profiling and screening of your **customers**.
- Review the **end-use** of the items.

- Look out for **risk indicators** involved in TBML

- Ensure that your business/transaction **does not contravene /circumvent applicable laws**.
- Be conscientious of **unilateral sanctions and measures imposed by other countries**.



Guidance Materials for Strategic Trade



<https://go.gov.sg/strategicgoodscontrol>

Overview of Strategic Goods Control



<https://go.gov.sg/strategictradescheme>

Strategic Trade Scheme



<https://go.gov.sg/sanctionedlists-redflags>

Guidance on sanctioned lists and red flags



<https://go.gov.sg/circular01-2025>

Joint Advisory: Export Controls on Advanced Semiconductor and Artificial Intelligence (AI) Technologies



Thank You





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