

Received: December 2022

Accepted: June 2023

DOI: 10.7862/rz.2023.hss.12

Ewa GWARDZIŃSKA¹
Małgorzata CHACKIEWICZ²

A BAN ON THE EXPORT OF EU GOODS TO RUSSIA

This article analyzes the ban on the export of goods from the EU to Russia, with particular emphasis on dual-use goods and export controls. In the current political situation, these controls pose a serious challenge to EU exporters, who have been placed under an additional obligation to reliably verify recipients, intermediaries, and, above all, the type of goods being shipped, in terms of compliance with the regulations governing exports. The catch-all clause is also discussed. On the one hand, this allows a great deal of discretion within the competence of the Member State when deciding whether a given good, its elements, or its ownership rights should be controlled. On the other, the exchange of information on licensing decisions between the licensing and customs authorities of the Member States and the Commission contributes to further harmonization of the practical application of the law by introducing a new dual-use control enforcement coordination mechanism. This is aimed at improving cooperation between law enforcement agencies, and exchanging best practices.

Keywords: export, export ban, dual-use goods, catch-all clause, security of international trade in goods exports.

1. INTRODUCTION

In the current political environment, exporting goods to Russia and the rules on controlling the export of goods have become a real challenge for EU exporters. Each of them should first of all determine whether a given goods is not on the list of prohibited goods for export and whether the planned export of goods requires obtaining permits or only completing the necessary formalities, for example in the form of a declaration. Otherwise, there is a risk of criminal liability and the risk of serious financial loss. It is necessary here to reliably verify suppliers, recipients, intermediaries and, above all, the type of goods sent, in terms of compliance with the regulations governing exports.

The issue of dual-use goods was and is subject to a general export ban, with a simultaneous tightening of controls on the export of sensitive goods and emerging technologies to destinations so as not to hinder legal trade. This issue has long been widely analyzed in the literature on the subject due to the broadly understood national security and human rights, and Google scholar identifies approx. dual-use export controls (Micara,

¹ Ewa Gwardzińska, Warsaw School of Economics, Poland; e-mail: egwardz@sgh.waw.pl, ORCID: 0000-0003-1656-2078.

² Małgorzata Chackiewicz, War Studies Academy, Poland; e-mail: m.chackiewicz@akademia.mil.pl (corresponding author). ORCID: 0000-0002-6255-2789.

2012, Vandenberghe, 2021, Walsh, 2004 etc) and linking controls with sanctions (Meissner, Urbanski, 2022 and Koutrakos, 2001) to linking existing research with practice (Bauer, Brockmann, Bromley and Maletta, 2017) and safety (Rychnovská, 2020). The same is true of klazula catch-all - there are also extensive scientific studies of about 1000 articles (including Gunther, Montero, Linz and Zero, Charpentier, 2017).

As you can see, the issue of the ban on the export of dual-use goods is extensive and accounts for as much as 10% of the exports of goods from the EU market (European Commission, 2011), but the problem of contemporary exports of goods from the EU to Russia has become even more complex and creates new research needs. The authors attempted to analyze this complicated problem from the regulatory side, as it is the one that causes the greatest difficulties for entities involved in international trade in goods, including EU exporters (Gwardzińska, 2018). The work is theoretical. The analysis uses the method of legal analysis in this area.

2. A BAN ON THE EXPORT OF EU GOODS TO RUSSIA

The ban on the export of EU goods to Russia covers not only dual-use goods, but also other goods placed on the prohibition lists. The EU legislator defines dual-use goods and technology as items, including software and technology, that can be used for both civilian and military purposes, and include items that can be used for the design, development, production or use of nuclear, chemical and chemical weapons. or biological or its means of delivery, including all products that can be used both in non-explosive applications and in any way supporting the production of nuclear weapons or other nuclear explosive devices (EU Regulation 833/2014 and EU Regulation 821/2021).

As the above definition shows, dual-use goods are both software, technology, documents and diagrams which are normally used for civilian purposes, but which may be used for military purposes. They may also include raw materials, components and complete systems, such as aluminum alloys, bearings or lasers, or items used in the production or development of military goods, i.e. machine tools, equipment for chemical production and computers, as well as some chemicals used in the production of, among others plastics, dyes or pesticides, and “special materials” such as the Ebola virus (Micara, 2012). The EU regularly updates the list of controlled products in line with decisions made under the export control systems (the Entrepreneur's Guide).

Generally there is a general prohibition on selling, supplying, transferring or exporting, directly or indirectly, dual-use goods and technology - whether or not they originate in the Union - on behalf of any natural or legal person, entity or body in Russia or for use in Russia and the provision of technical assistance, brokerage services or other services in connection with these goods and technologies, as well as the provision of financing or financial assistance related to goods and technologies, dual-use, for any sale, supply, transfer or export of these goods and technologies, or for the provision of related technical assistance, brokerage services or other services , directly or indirectly on behalf of any natural or legal person, entity or body in Russia or for use in Russia. The ban on the export of goods also applies to (Council Regulation (EU) No. 833/2014):

- sale, supply, transfer or export, directly or indirectly, of goods and technology that could contribute to the strengthening of the military and technological potential of Russia or the development of the defense and security sector, as mentioned in Annex VII (applies to ten categories of goods grouped under different groups: category 1 – electronics; category 2 – computers; category 3 includes Part 1 – telecommu-

nications and Part 2 – information security; category 4 – sensors and lasers; category 5 – navigation and avionics; category 6 – marine equipment; category 7 – astronautics, aeronautics and propulsion; category 8 – miscellaneous items; category 9 – special materials and related devices; category 10 – material processing) and the provision of technical assistance, brokerage services or other services in connection with these goods, and the provision of financing or financial assistance in relation to goods and technology (Article 2a),

- sale, delivery, transfer or export, directly or indirectly, of products or technology listed in Annex II (applies to goods with CN / HS codes: 7304 11 00; 7304 19 10; 7304 19 30; 7304 19 90; 7304 22 00; 7304 23 00; 7304 29 10; 7304 29 30; 7304 29 90; 7305 11 00; 7305 12 00; 7305 19 00; 7305 20 00; 7306 11; 7306 19; 7306 21 00; 7306 29 00; 8207 13 00; 8207 19 10; ex 8413 50; ex 8413 60; 8413 82 00; 8430 49 00; ex 8431 39 00; ex 8431 43 00; ex 8431 49; 8705 20 00; 8905 20 00; 8905 90 10) - notwithstanding that, whether they come from the Union – for the benefit of any natural or legal person, entity or body in Russia, including its exclusive economic zone and continental shelf, or for use in Russia, including its exclusive economic zone and continental shelf, and benefits technical assistance, brokerage services or other services related to these goods, and financing or financial assistance related to the goods and technology (Article 3),
- sale, supply, transfer or export, directly or indirectly, of goods and technology suitable for use in the refining of crude oil and the liquefaction of natural gas, as listed in Annex X (relating to CN codes: 8414 10 81; 8418 69 00; 8419 40 00; 8419 40 00; 8419 50 20; 8419 50 80; 8419 50 20; 8419 50 80; 8419 60 00; 8419 60 00; 8419 89 98; 8421 39 15; 8421 39 25; 8421 39 35; 8421 39 85; 8419 60 00; 8419 89 98; 8421 39 35; 8421 39 85; 8419 89 10; 8419 89 98 (including equipment for alkylation and isomerization, aromatic hydrocarbon production, catalytic reforming / cracking, flexicoking, naphtha isomerization, polymerization, sulfur production, sulfuric acid alkylation and sulfuric acid regeneration, thermal cracking, pre-cracking, vacuum gas oil hydrocracking, transalkylation [toluene and heavy aromatic compounds], slow coking retorts, hydrocracking reactors, hydrocracking reactor tanks, and hydrogen production technologies and hydrotreatment technologies / equipment) as well as CN code 8479 89 97, whether the goods are of Union origin, and are supplied to any natural or legal person, entity or body in Russia or for use in Russia and for the provision of assistance technical, brokerage or other services related to goods and technology, and the provision of financing or financial assistance (Article 3b),
- the sale, supply, transfer or export, directly or indirectly, of goods and technology suitable for use in the aviation or space industry, listed in Annex XI (Chapter 88), and jet fuels and fuel additives listed in Annex XX (CN code: 2710 12 70; 2710 19 29; 2710 19 21; 2710 20 90; 3811 21 00; 3811 29 00; 3811 90 00; 3811 21 00; 3811 29 00; 3811 90 00; 3811 21 00; 3811 29 00 ; 3811 90 00; 3811 21 00; 3811 29 00; 3811 90 00; 3811 21 00; 3811 29 00; 3811 90 00; 3811 21 00; 3811 29 00; 3811 90 00; 3811 21 00; 3811 29 00; 3811 90 00), whether or not they originate in the Union, and are provided to any natural or legal person, entity or body in Russia or for use in Russia (Article 3c),
- sale, supply, transfer or export, directly or indirectly, of maritime goods and technology as listed in Annex XVI (Ships, marine systems or equipment, and specially designed components, subassemblies and accessories therefor: navigation

and radio-communication equipment), independently whether they originate in the Union, for the benefit of any natural or legal person, entity or body in Russia, for use in Russia or for boarding a Russian-flagged vessel and for the provision of technical assistance, brokering or other goods related services and technology as well as financing or the provision of financial assistance related to goods and technology and the provision of technical assistance, brokerage services or other services related to goods and technology as well as the provision of financing or financial assistance (Article 3 f),

- sale, supply, transfer or export, directly or indirectly, of luxury goods listed in Annex XVIII (this applies to luxury goods, the value of which is, in principle, EUR 300 per head, unless otherwise specified, and applies to purebred horses for breeding and others; caviar and caviar substitutes; truffles and truffle preparations; wine (including sparkling wine), beer, alcohol and spirits; cigars and cigarillos; perfumes, toilet waters and cosmetics, including beauty and make-up products; leather products, saddlery and travel goods, handbags and similar articles; coats or other garments, clothing accessories and footwear (whatever the material from which they are made); carpets, rugs and tapestries, whether or not hand-woven; pearls, precious and semi-precious stones, articles pearls, jewellery, products made of gold and silver; coins and banknotes, other than legal tender; metal cutlery in precious or clad or covered with a layer of precious metal; tableware of porcelain, china, stoneware or earthenware or fine ceramics; lead glass articles; household electronic devices with a value exceeding EUR 750; electrical / electronic or optical sound and image recording or reproducing devices with a value exceeding EUR 1 000; vehicles, with the exception of ambulances, for the transport of persons by land, air or sea, with a value exceeding EUR 50,000 per item, cable cars, chairlifts, ski lifts, power systems for cable cars or motorcycles, a value exceeding EUR 5,000 per item, as well as accessories and spare parts therefor; clocks and watches and parts therefor; musical instruments with a value exceeding EUR 1,500; works of art, collectors' items and antiques; articles and equipment for sports, including skiing, golfing, diving and water sports; optical products and equipment of any value; for the benefit of any natural or legal person, entity or body in Russia or for use in Russia (Article 3h),
- sale, supply, transfer or export, directly or indirectly, of goods that could contribute, in particular, to increasing the industrial potential of Russia, listed in Annex XXIII (applies to 681 HS codes, including prefabricated timber buildings; fire engines, tracked tractors, microwave lamps; galvanic cells and batteries; tapered roller bearings, including bearings without an inner or outer ring; cross planers or slotting machines, for working metals, metal carbides or cermets; dryers; parts and accessories of weaving machines (looms) or their auxiliaries; devices for heating water; jet engines other than turbojets; knives and cutting blades, for machines or for mechanical devices; sheet metal, strip and foil, of lead; textiles and felt; bulbs, tubers, tuberous roots, underground shoots, crowns and rhizomes; hydrogen; nitrogen; oxygen; synthetic, organic substances in tanning; et c) to any natural or legal person, entity or body in Russia or for use in Russia and the provision of technical assistance, brokerage services or other services related to goods and technology, as well as the provision of financing or financial assistance (Art. 3 k).

It is worth noting here that dual-use goods can be freely traded in the EU, with the exception of some particularly sensitive products, the transfer of which within the EU is subject to prior authorization (see Annex IV to the Regulation) and concerns a list of

approx. 240 natural or legal persons and entities or bodies. The sanctions imposed by the EU on the export of goods to Russia – not only dual-use goods, but also goods that can contribute to economic development or luxury goods, are intended to weaken the Kremlin's ability to finance the war and reduce the economic and political base of the Russian political elite to support invasion of Ukraine.

3.THE EU EXPORT CONTROL SYSTEM AND THE CATCH-ALL CLAUSE

Since 1995, it has been widely accepted that dual-use export control is an exclusive competence of the European Union and an integral part of the EU's common commercial policy (European Commission, 2011). In the case of dual-use goods, since 2009, there is an export control system, initially regulated by Regulation 428/2009, which was later transformed into the EU export control system, which is now based on the provisions of Regulation (EU) 2021/821 and includes (Exporting dual- use goods, 2022):

- common export control rules, including a common set of evaluation criteria and common types of authorizations (individual, global and general authorizations);
- a common EU list of dual-use items;
- common end-use control rules for non-listed items that may be applied, for example, in connection with a weapons of mass destruction program or in cases of human rights violations;
- brokering and technical assistance controls related to dual-use items and their transit through the EU;
- specific control and compliance measures to be introduced by exporters, such as record keeping and records, and; rules establishing a network of competent authorities to support the exchange of information and the consistent implementation and enforcement of controls across the EU.

The EU legislator, despite establishing a closed catalog of the ban on the export of goods to Russia, has left the control authorities a door in the form of a catch-all clause, which gives the EU national authorities the power to control virtually every shipment abroad for dual-use. According to it, these authorities have the right to inspect non-listed goods if there is reasonable suspicion that their export may pose a risk to public security (Tomczyk,2017).

There is no doubt that the catch-all clause provides a large discretionary power for a Member State when deciding whether a given product or its element should be inspected. All this makes S. Bennink and Gonnine van Dam say that the EU's export control system is collapsing under the EU's common commercial policy, as individual member states decide independently how to enforce these rules at the national level and apply the national level of sanctions. This thesis is not entirely in line with the current reality, as the exchange of information between the licensing and customs authorities of the Member States and the Commission on the decisions made on the authorizations issued contributes to further harmonization of the practical application of the law, while introducing a new coordination mechanism for the enforcement of product controls. dual-use that aims to improve cooperation between law enforcement agencies and exchange of best practice.

An additional obligation has been imposed on the exporter to reliably verify recipients, intermediaries and, above all, the type of goods sent, in terms of compliance with the regulations governing export control. Internal Compliance Program “or” ICP” means the existing effective, appropriate and proportionate policies and procedures adopted by exporters to comply with the rules and achieve the objectives of this Regulation and to

meet the conditions of authorizations implemented under this Regulation, including between other due diligence measures assessing the risk related to the export of products for end-users and end-use uses (Article 2 (21) of Regulation 2021/821).

In the daily practice of export control, ICP is a key “protective shield” for companies. Granting export licenses often depended on the proven credibility of the company. Thanks to ICP, the exporter can confirm this reliability. Moreover, violations of export control law are not only punishable under criminal law or lead to negative administrative consequences (including criminal proceedings) – violations of export laws can result in a huge loss of image of the companies concerned. A functioning ICP can at best help eliminate or reduce these risks.

3.1. Relationship between the Customs Classification Codes (HS / CN) and the Export Control Classification Codes

In 2019, the European Commission, in order to meet the expectations of the entities of customs law in the field of dual-use goods, published a correlation table that establishes links between customs classification codes (HS / CN) and export control classification codes (ECCN). ECCNs are five-character alphanumeric designators used in the Trade Control List (CCL) to identify dual-use items for export control purposes. ECCN categorizes items based on the nature of the product, i.e. the type of goods, software or technology, and relevant technical parameters (Correlation table between export control classifications).

However, you should be careful when using this tool as the two systems differ in purpose, content and scope. It is therefore possible that one ECCN number will be associated with dozens of different HS / CN classifications and one HS / CN classification will refer to several ECCNs. Moreover, the HS / CN classification may not automatically correspond to the ECCN classification, as the use (and end-user) of the product will also be a factor in whether the product is inspected or not (Pilarczyk, 2022). On January 7, 2022, the European Commission published an updated edition of the correlation tables between TARIC and dual-use codes (Ross Evans, 2022, (Correlation tables between TARIC).

4. AUTHORIZATION FOR TRADE IN DUAL-USE GOODS

A special type of trade in goods is trade in dual-use goods, which may be subject to export authorizations and concerns four types (Exporting dual-use goods):

- individual export authorizations – an authorization granted to one specific exporter for one end-user or consignee in a third country, covering one or more dual-use items (Article 2(12));
- global export authorizations – an authorization granted to one specific exporter for a type or category of dual-use items which may be valid for export to one or more specified end-users or in at least one specified third country (Article 2(13));
- National General Export Authorizations (NGEAs): – can be issued by EU Member States if they are in line with existing EU General Export Authorizations EUGEA and do not relate to the items listed in Annex IIg of the Regulation. may apply to the products and destinations listed in Sections A to H of Annex II, but exclude from their scope the products listed in Section I of that Annex, and shall be issued after meeting the requirements of Annex III, Section C;
- EU General Export Authorizations (EUGEAs) for the export of certain products to specific destinations under the specific conditions and requirements set out in

sections A-H of Annex II – applies to an authorization to export to all EU countries the goods indicated therein to each entity and relate to: exports to Australia, Canada, Iceland, Japan, New Zealand, Norway, Switzerland, Liechtenstein, Great Britain and the United States of America; exports of certain dual-use items to certain destinations; exports after repair / replacement; temporary exports for exhibitions or fairs; telecommunications; chemicals; intra-group technology transfers and; encryption.

- An application for an individual, global or national general export license in Poland is submitted to the Ministry of Development and Technology, Department of Trade in Sensitive Goods and Technical Safety. The application is free of charge. It should be enclosed with (the Entrepreneur's Guide):
 - a declaration of possession of a license or other permits authorizing the holder of strategic goods or conducting activities related to the proposed trade, if such licenses or permits are required under the provisions of other acts, along with the exact identification features of these documents;
 - a draft agreement or a trading agreement, if such agreement is required for a given trading, or a letter of intent or an inquiry;
 - import certificate or end user declaration in case of export or intra-EU transfer;
 - consent of a competent foreign authority for specific disposal of the goods in the event that the importer or end user undertook to obtain it.

The authorization is issued within one month and is valid for up to two years, unless the customs authority decides otherwise. In the case of a general EU permit, the entity that meets the conditions set out in Annex 2 to Regulation 2021/821 does not have to submit an application for a permit. It is enough for him to submit a declaration on the date of commencement of international trade in dual-use products. Such declaration must be submitted to the customs authority at the latest one month from the date of exportation of the goods. The competent authority of the issuing Member State may refuse to grant an export authorization and may annul, suspend, modify or revoke an export authorization which has already been granted. Where an export authorization is refused, revoked, suspended, substantially limited or revoked by a competent authority, or where a competent authority determines that the intended export should not be authorized, that authority shall notify the competent authorities of the other Member States and the Commission and provide them with the relevant information. In case the competent authority of a Member State suspends an export authorization, the final assessment will be communicated to the competent authorities of other Member States and the Commission at the end of the suspension period (Art. 16 of Regulation 2021/821).

In case of doubts as to whether it is necessary to obtain an authorization for a specific trade in dual-use products, it is possible to submit an application for an explanation to the Minister of Development and Technology. The authority, after reviewing the circumstances of the case, will provide a binding explanation regarding the need to obtain a permit for a given trade within 3 months from the date of submitting the application, and in justified cases the deadline may be extended to 6 months.

5. FINAL REMARKS

The ban on the export of goods to Russia included in the prohibition lists applies not only to dual-use goods, but also to other goods, e.g. luxury goods or other goods that may

contribute to increasing the industrial potential and are the result of sanctions imposed on this country after the invasion of Ukraine.

The use of the catch-all clause allows, on the one hand, a high degree of discretion in the powers of a Member State when deciding whether a given good, its element or ownership rights should be controlled, and on the other hand, the exchange of information between the licensing and customs authorities of the Member States and the Commission on the subject of licensing decisions contributes to further harmonization of the practical application of the law, while introducing a new dual-use control enforcement coordination mechanism aimed at improving cooperation between law enforcement authorities and the exchange of best practices. A helpful tool in the classification of dual-use goods may be the correlation table created by the European Commission, which establishes links between customs classification codes (HS / CN) and export control classification codes (ECCN), categorizing items based on the nature of the product, i.e. the type of goods, software or technology and appropriate technical parameters. However, you should be careful when using this tool as the two systems differ in purpose, content and scope.

The ban on exports of goods to Russia introduced by the EU is one of the effective tools that has significantly weakened the country's economic and military potential. Although it was introduced in order to limit Russia's ability to finance the war and to burden its political elites responsible for the invasion with real economic and political costs, it also became a serious barrier to business activity for EU entrepreneurs and contributed to a decrease in their income and even in some cases led to their bankruptcy.

REFERENCES

- Bauer, S., Brockmann, K., Bromley, M., Maletta, G. (2017). *Internal Compliance and Export Control Guidance Documents for Actors from Academia and Research*. Stockholm International Peace Research Institute [Access: 23.05.2022]. Access on the internet: <https://www.jstor.org/stable/pdf/resrep24448.pdf>.
- Bennink, S., van Dam, G. (2019). *Catch me if you can: toward a common policy on EU catch-all controls*. WorldECR [Access: 25.06.2022]. Access on the internet: https://batradelaw.com/wp-content/uploads/2019/12/EU_catch_all_controls_policy.pdf.
- Correlation table between export control classifications and Combined Nomenclature Code, [Access: 30.06.2022]. Access on the internet: https://trade.ec.europa.eu/doclib/docs/2016/february/tradoc_154240.pdf.
- Correlation tables between TARIC. Access on the internet: https://trade.ec.europa.eu/doclib/docs/2022/january/tradoc_160003.xlsx.
- European Commission (2011). GREEN PAPER The dual-use export control system of the European Union: ensuring security and competitiveness in a changing world, Brussels, 30.06.2011, KOM(2011) 393.
- Exporting dual-use goods [Access: 23.08.2022]. Access on the internet: https://policy.trade.ec.europa.eu/help-exporters-and-importers/exporting-dual-use-goods_en.
- Gunther, R., Montero, J.R., Linz, J. et al. (2002). *Political Parties: Old Concepts and New Challenges*, Oxford.
- Gwardzińska E., Tymińska I. (2018). *Extraterritorial understanding of the term "exporter" in the EU customs law*, *Journal of Customs and Tax Law* No. 12/2018.
- Koutrakos P. (2001). *Trade, Foreign Policy and Defence in EU Constitutional Law: The Legal Regulation of Sancions Exports of Dual – Use Goods and Armaments*. Oxford.

- Meissner, K.L., Urbanski, K. (2022). *Feeble rules: one dual-use sanctions regime, multiple ways of implementation and application?* „*European Security*”, Vol. 31, Issue 2.
- Micara, A.G. (2012). *Current Features of the European Union Regime for Export Control of Dual-Use Goods* [Access: 30.09.2022]. Access on the internet: <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1468-5965.2012.02249.x>.
- Pilarczyk, R. *Dual-use products. What do you need to know before exporting them?* [Access: 1.08.2022]. Access on the internet: <https://www.parp.gov.pl/component/content/article/75828:produkty-podwojnego-zastosowania-co-trzeba-wiedziec-przed-ich-eksportem>.
- Entrepreneur's guide [Access: 12.10.2022]. Access on the internet: <https://poradnik-przedsiębiorcy.pl/-czym-sa-produkty-podwojnego-zastosowania>. June 25, 2022.
- Council Regulation (EU) No 833/2014 of 31 July 2014 on measures restrictions in connection with Russia's actions destabilizing the situation in Ukraine, Journal of UE L 229 of 31.07.2014. Consolidated version.
- 2022/576 of 8 April 2022 on the amendment Regulation (EU) No. 833/2014 concerning restrictive measures in view of Russia's actions destabilizing the situation in Ukraine, Journal of UE L 111 of 08/04/2022.
- 2021/821 of the European Parliament and of the Council of 20 May 2021 establishing the EU system for the control of exports, brokering, technical assistance, transit and transfer of dual-use items, OJ. UE L 206 of June 11, 2021.
- No 428/2009 of 5 May 2009 establishing the dual-use goods export, transfer, brokering and transit control system, Journal of UE L 134 of 29.5.2009.
- Ross, E. *EU updates list of items subject to Dual-Use Export Controls* [Access: 13.07.2022]. Access on the internet: <https://sanctionsnews.bakermckenzie.com/eu-updates-list-of-items-subject-to-dual-use-export-controls/>. January 11, 2022.
- Rychnovská, D. (2020). *The EU politics of dual-use research* [In:] Calcara, A., Raluca Csernatonî, R. *Chantal Lavallée Emerging Security Technologies and EU Governance. Actors, Practices and Processes*. Routledge. Access on the internet: <https://www.taylorfrancis.com/chapters/edit/10.4324/9780429351846-11/security-meets-science-governance-dagmar-rychnovsk%C3%A1?context=ubx&refId=0a0b0f3c-966e-4e63-8676-93be1ff27f54>.
- Suzuki, K. (2007). *Between Trade and Security: EU's Export Control Regime and Its Global Role* In: UNSPECIFIED, Montreal, Canada. (Unpublished), Access on the internet: <http://aei.pitt.edu/8044/1/suzuki%2Dk%2D04f.pdf>.
- Tomczyk, M. (2017). *International trade in strategic goods in Polish regulations* [In:] Chackiewicz, M., Mrówka, M., Wąsiński, J., eds., *Export and import management. Non-tariff restrictions in foreign trade – selected issues* – ed. Higher School of Management Education. Wrocław.
- Vandenbergh, K., *Dual-Use Regulation 2021/821: What's Old & What's New in EU Export Control* „*Global Trade and Customs Journal*”, Vol. 16, Issue 9. August 28, 2021.
- Walsh, E.P. (2004). *Security Shifts and Power Plays: The Case of European Union Dual-Use Export Control Regime Development* [Access: 3.06.2022]. Access on the internet: https://getd.libs.uga.edu/pdfs/walsh_eamon_p_200405_ma.pdf.
- Wetter, A. (2009), *Enforcing European Union Law on Exports of Dual-use Goods*. Oxford University Press.
- Zero, S., Charpentier, A. (2017). *BOTTICELLI Project: Enhancing Export Control Cooperation Between Industry and Governments* [w:] Dai, T., Achilleas, P., ed., *Theory and Practice of Export Control. Balancing International Security and International*. SpringerBriefs in Economics.

