

Appendix 1

Comparison of Military Export Controls In Key Areas

Area	United States	United Kingdom	Australia
Brokering	Controls any US person, <i>wherever located</i> , and any foreign person subject to US jurisdiction, for <i>all</i> military items.	Controls any UK person, <i>wherever located</i> , for WMD and instruments of torture, but for most <i>other military items</i> only when brokered from UK territory and only for items situated outside of UK. (open licenses available)	<i>Considering</i> controls on brokers operating within Australia.
Internal transfers to foreign persons	Controls transfers by US persons to foreign persons <i>whether in the US or abroad</i> .	Will not control.	Will not control.
Transshipment	Controls all temporary imports, including items in transit or transshipment.	Generally not controlled (where controls apply, open licenses available).	Unknown.
Technical Assistance	Controls technical data exports and <i>all forms</i> of technical assistance for <i>both conventional arms & WMD</i> .	Controls technical data exports, and <i>all forms</i> of technical assistance for WMD exports <i>outside EU</i> or EU embargoed countries. <i>Conventional arms assistance generally not controlled</i> .	Intends to establish controls over technical assistance.
Intangible Transfers	Controls transfer by <i>any means (including oral or visual disclosure)</i> of <i>all military items</i> .	Controls <i>oral and visual transfers only for WMD</i> ; Controls for all items when by electronic means and telephone to extent a controlled document is read out.	Intends to establish controls over exports by any means.
Incorporated Technology	<i>Always controlled</i> , even when incorporated into other end items, including commercial items.	Military items incorporated into commercial end items generally <i>not controlled</i> .	Unknown.
Licensed Production	<i>Controls items produced</i> or derivative items, as well as original export of manufacturing data.	<i>Not controlled</i> , except for original export of manufacturing data.	Does not intend to control licensed production beyond original export of manufacturing data.