



New and updated General Authorisations

Trade
Compliance

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In a press release dated 30 January 2026, the Federal Ministry for Economic Affairs and Energy (*Bundesministerium für Wirtschaft und Energie* – BMWF) announced a new package of measures, jointly adopted with the Federal Office for Economic Affairs and Export Control (*Bundesamt für Wirtschaft und Ausfuhrkontrolle* – BAFA), aimed at accelerating and simplifying export controls for military and dual-use items. In light of the current security policy challenges, the package includes several revised and newly introduced General Authorisations (*Allgemeine Genehmigungen* – AGGen), which entered into force on 1 February 2026. The following article provides a brief overview of the most important changes.

1. Streamlined Export Control Procedure through General Authorisations

Due to the particular risks associated with the export of military and dual-use items, these are generally examined and approved by BAFA on a case-by-case basis. To reduce administrative burdens, BAFA continuously identifies exports that, for example due to their intended destination, pose a lower risk potential and consolidates them into AGGen. If an item subject to export/transfer licensing requirements meets the conditions of such an AGG, the export/transfer is considered authorised without the need to submit an individual application to BAFA. Only a (one-time) registration as a user of the respective AGG with BAFA is required. By reserving the individual license procedure for the most sensitive exports, the aim is not only to relieve BAFA and accelerate the process for exports of military and dual-use items, but also to provide exporting companies with greater planning ability. The latter results from the assurance that, for the duration of an AGG, items covered by it may be exported without an additional application and without further procedures at BAFA.

2. New General Authorizations for the Export and Transfer of Software and Technology in the Defense Sector

At the heart of the current package of measures concerns the export or transfer of **military technology and software listed under sub-numbers 0021a and 0022a** of Part I, Section A of the Export List (Annex AL to the Foreign Trade and Payments Ordinance (*Außenwirtschaftsverordnung* – AWW)). Both AGGen impose quite extensive requirements, which are presented here only in overview and can be viewed in full here: [BAFA - Allgemeine Genehmigungen](#).

The newly introduced **AGG No. 45** covers the upload or storage of military technology and software on certain servers located in EU Member States. The server used must meet at least the C5 catalogue of criteria established by the Federal Office of Information Security (*Bundesamt für*

Sicherheit in der Informationstechnik – BSI). Furthermore, **only natural or legal persons located within Germany may have access to the server**; if persons outside of Germany also have access, an additional license is required. In addition, the persons authorized to access the server must be employed either by the transferring company, by companies legally affiliated with it within the same group, or by companies located in Germany that act on behalf of the transferor.

The new **AGG No. 46** covers the transfer and export of military technology and software within the framework of **projects under the European Defence Fund (EDF)**. The exports and transfers must be carried out by persons, entities, and organisations that are involved in an EDF project and are expressly named in the corresponding grant agreement with the European Commission (with additional possibilities). Furthermore, the user must, on a one-time basis, include an end-use certificate from the recipient or end-user in their business records and present it to BAFA upon request, unless the underlying, signed consortium agreement between the project participants contains a re-export clause addressed to the competent licensing authorities that is unlimited in its period of validity.

3. Overview of Further Amendments

In addition, the package of measures includes further adjustments in military exports and dual-use items:

Primarily clarifying in nature, the revised **AGG No. 13** (export of certain dual-use items in specific case categories) emphasizes that items intended for nuclear or military purposes, or for use in delivery system technology, falling under 4.24 to 4.26 of Section II AGG No. 13, are exempt from the individual licensing procedure even if the exporter is aware of this intended use. This applies to items exported to the armed forces of an EU Member State for the performance of official duties or for official use outside their national territory.

The revised **AGG No. 17** (frequency converters, capacitors, and lasers) expands the list of items permitted under it to include lasers classified under items 6A005a6a and 6A005a6b of Annex I to Regulation (EU) 2021/821 (EU Dual-Use Regulation). This follows a decision of the Wassenaar Plenary on 5 December 2025, according to which these lasers are to be removed from the list of controlled dual-use items. Until the amended Annex I of the EU Dual-Use Regulation enters into force in 2026, AGG No. 17 anticipates this change to allow early use of the associated procedural simplifications.

In the field of military exports, **AGG No. 21** (protective gear) now also covers items intended for the identification of chemical and biological agents as well as radiation relevant to nuclear matters. The export or transfer of such items no longer requires an individual license, thereby increasing the usability of AGG No. 21 for protective equipment.

Furthermore, the temporary export or transfer of certain items under **AGG No. 24** is now permitted for additional countries.

AGG No. 28 (Agreement on Export Controls in the Defence Sector) also provides for an expansion of its scope of application. Following the accession of the United Kingdom of Great Britain and Northern Ireland to the agreement between Germany, France, and Spain, exports to these countries are now also covered.

4. Conclusion

Overall, it can be concluded that the recent revised and newly created AGG provide additional reliefs for exporters of dual-use and military items. **However, affected companies remain obliged to carefully review and comply with the respective requirements of each AGG.** The removal of the individual application process at BAFA is accompanied by increased responsibility, as companies must ensure that AGGen are used only when all conditions — including their sometimes extensive supplementary provisions — are fully met.

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