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High Eye Airboxer UAV – Dual-Use and Customs Classification

Components

- Airboxer UAV (helicopter-type, gasoline-powered)
- Ground Control Station (GCS)
- Tracking antenna
- Telemetry and control software

Technical and Regulatory Overview

The Airboxer is an unmanned aerial vehicle (UAV) with rotor blades (helicopter type), designed for vertical take-off and landing (VTOL). The aircraft features autonomous flight capabilities, including GPS waypoint navigation, return-to-home functionality, and fail-safe logic. The system is supplied with a Ground Control Station (GCS) and a tracking antenna for communication and control.

Based on these characteristics, the Airboxer system falls within the scope of the EU Dual-Use Regulation (EU) 2021/821.

Applicable Dual-Use Export Controls

Component	Export Control Classification (EU 2021/821)	Description
Airboxer UAV	9A012.b.2	Helicopter-type UAV with autonomous navigation
Ground Control Station (GCS)	9A012.d	Control station specially designed for UAVs classified under 9A012
Tracking Antenna	9A012.d	Communication equipment specially designed for UAVs classified under 9A012



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Customs Classification (HS/CN/TARIC)

Component / System	Customs Code	Description
Airboxer System (complete)	8806.10.00.00	Unmanned aircraft, helicopters (civilian use)
Airboxer System (complete)	8802.20.00	Unmanned aircraft, helicopters (military use)

Note: The choice between customs codes 8806.10.00.00 and 8802.20.00 depends on the final classification as either civilian or military use.

What Is the EU Dual-Use Regulation?

The Dual-Use Regulation (EU) 2021/821 is European legislation governing goods, software, and technology that can be used for both civilian and military purposes.

In other words, a product may have legitimate commercial applications while also being suitable for military operations, weapons development, or other security-sensitive uses. For this reason, export control measures apply. In many cases, an export authorization is required for exports outside the European Union.

Why Does the Airboxer Fall Under Dual-Use Controls?

The Airboxer UAV includes:

- Autonomous navigation
- GPS waypoint functionality
- Return-to-home functionality
- A Ground Control Station (GCS)
- Communication and tracking equipment

Such UAV systems may be used for:

- Infrastructure inspections
- Surveying and mapping
- Surveillance operations
- Border monitoring
- Military and defense applications

For this reason, they are often classified under dual-use export control categories such as 9A012 and related entries.



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When High Eye exports an Airboxer system:

Within the European Union, shipment is often possible without an export license.

For exports outside the EU, the following must be assessed:

- Destination country
- End user
- End use
- Whether an export authorization is required

Depending on the destination and end user, an export license may be mandatory or the export may even be prohibited.

Meaning of Classification 9A012

Classification 9A012 is an export control category covering certain unmanned aerial vehicles (UAVs) and specially designed components, software, and equipment associated with such systems.

Based on the technical characteristics of the Airboxer UAV, including autonomous navigation capabilities, a Ground Control Station (GCS), and associated communication equipment, the system may fall within the relevant dual-use export control provisions.

For exports outside the European Union, an export authorization may be required depending on the destination, end user, and intended end use.

There is no single list of prohibited countries that applies to all dual-use goods. Export requirements depend on:

- The product
- Its export control classification (such as 9A012)
- The end user
- The intended end use



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Countries Requiring Particular Attention

For UAV systems such as the Airboxer, the following destinations are generally considered high-risk from an export-control perspective:

- Russia
 - Extensive sanctions apply; dual-use goods and many related technologies are prohibited from export.
- Belarus
 - Similar restrictions apply to numerous dual-use products and technologies.
- Iran
 - Strict export controls and sanctions, particularly relating to aviation, UAV, and military applications.
- North Korea
 - Near-total restrictions apply to strategic and dual-use goods.
- Myanmar (Burma)
 - Various sanctions and export restrictions may apply depending on the product and end user.

In addition, export authorization requirements may apply for other destinations if there are indications of:

- Military end use
- Weapons development programs
- Nuclear-related activities
- Chemical or biological weapons activities
- Human rights concerns
- Military end users



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Our Airboxer

For the Airboxer UAV and related equipment classified under 9A012, High Eye should seek verification from the Dutch CDIU (Central Import and Export Service) or a qualified export control advisor before any export outside the European Union.

License requirements can vary significantly depending on the destination country, end user, and intended end use.

Destinations with Generally Simplified Procedures

The EU maintains certain General Export Authorizations for a number of lower-risk destinations, including:

- United States
- Canada
- United Kingdom
- Switzerland
- Norway
- Japan
- Australia
- New Zealand
- Iceland
- Liechtenstein

Depending on the exact classification, simplified authorization procedures may be available for exports to these destinations.



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What Is the CDIU?

The CDIU (Central Import and Export Service) is a division of the Dutch Customs Administration.

The CDIU is responsible for, among other things, export licensing and oversight of strategic goods, including dual-use products such as UAVs, drones, sensors, software, and aerospace technologies.

The CDIU can:

- Assess whether a product falls under dual-use legislation
- Confirm the correct export control classification
- Issue export licenses
- Provide guidance on licensing requirements
- Assess whether a specific export to a particular destination and end user is permitted

When Should CDIU Be Contacted?

Examples include situations where:

- An Airboxer UAV is being exported outside the EU
- The end user is a defense organization, government entity, or research institution
- There is uncertainty regarding classification under 9A012
- The customer is located in a sanctioned or high-risk country

Export Control Procedure

1. Verify product classification (e.g., 9A012).
2. Review the destination country.
3. Verify the end user.
4. Verify the intended end use.
5. Determine and document whether a CDIU export authorization is required.