



Internal Compliance Program – Series (21) – End Use Screening

Today, in the hands-on practical advice series on Internal Compliance Programs for Export Control:

Part 21: End Use Screening

The objective for the end-use screening is to:

- verify that the items to be exported will not be used for purposes other than the declared use,
- ensure that any non-listed dual-use items for a destination subject to a binding embargo, are not intended for a “military end-use”.

The ICP must create a system that will identify and stop export, re-export, and selected in-country transfer transactions that involve certain end-uses and activities to determine what appropriate authorization is to be used.

A good compliance practice is to:

1. verify the intended end use of the exported item for each order;
2. obtain this information primarily obtained via contacts with the customer and following consultation of open, i.e. publicly accessible, sources on the end user concerned
3. obtain a number of guarantees, i.e. an end-user certificate drawn up and signed by the customer at an early stage of the sales process;
4. ensure that the end-use statement clearly specifies the intended end use and comprises a commitment by the consignee of the items to not using these items for proliferation purposes or the production of weapons of mass destruction
5. check that this document also indicates whether it concerns a defence-related end use and specifies the exact location of the items and the ordered quantities.

Your ICP should allow sufficient resources for you to screen your customer, consignee and/or end user, to check the end-use certificate, verify if the indicated end use is logical and in line with previously held customer information and tally with the end user’s business activities, and be attentive to the type and quantity of products ordered compared to previous orders.

