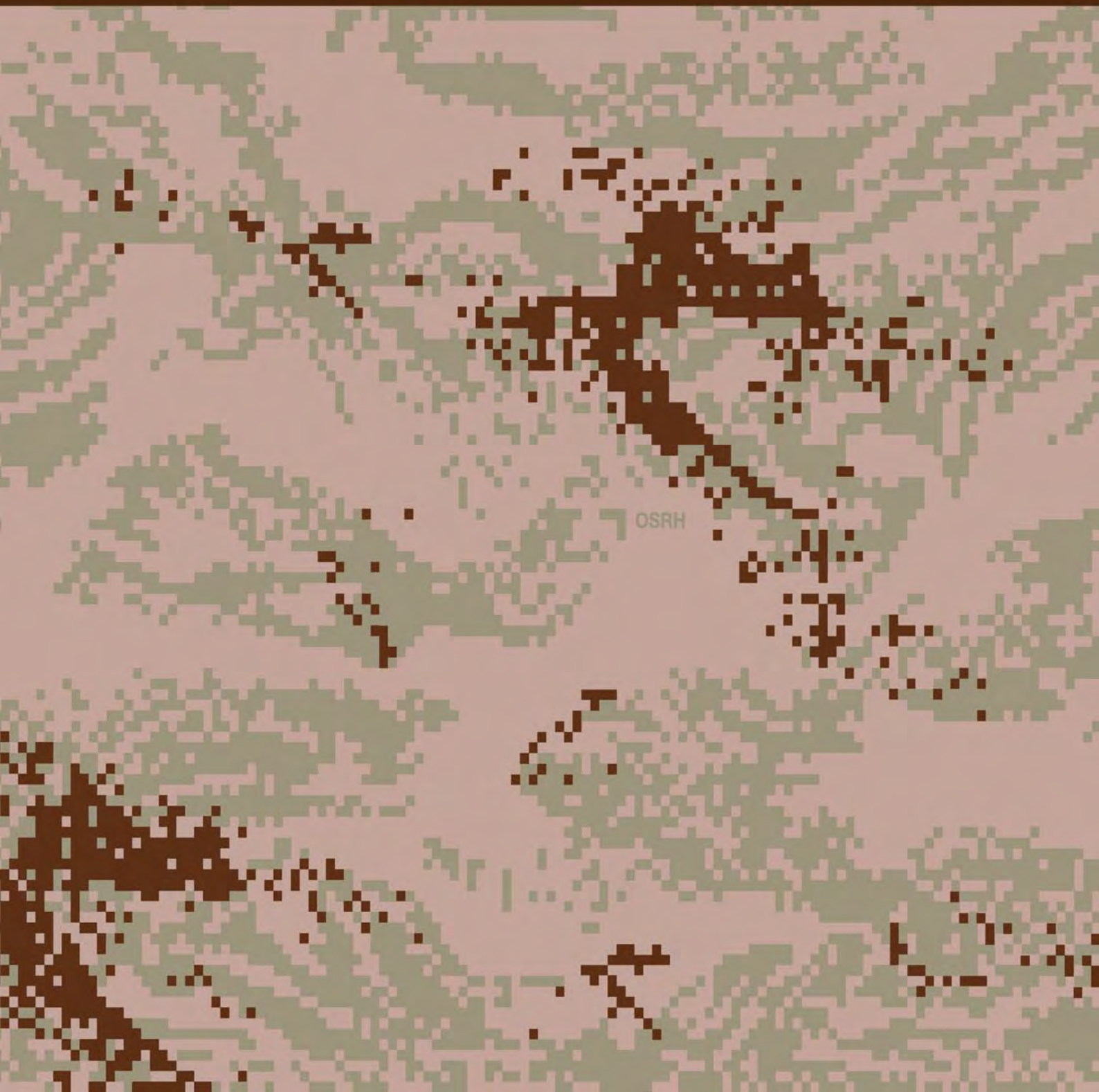




REPUBLIC OF CROATIA  
MINISTRY OF ECONOMY, LABOUR  
AND ENTREPRENEURSHIP

# Annual Report on Export and Import of Military Goods and Non-Military Lethal Goods for 2010



## Annual Report on Export and Import of Military Goods and Non-Military Lethal Goods for 2010

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The Ministry of Economy, Labour and Entrepreneurship of the Republic of Croatia has prepared the Annual Report on Export and Import of Military Goods and Non-Military Lethal Goods for 2010. The Report comprehensively covers all the efforts that have been invested by the relevant bodies of the Republic of Croatia in the course of the year, in order to establish as successful a system of export and import control as possible for military goods and non-military lethal goods. The Report includes the description of the legal framework, together with various methods of international cooperation and assistance to the domestic industry with the aim of export facilitation. The Tables attached provide the data on issued and used licences for export and import of military goods and non-military lethal goods for commercial purposes in 2010.

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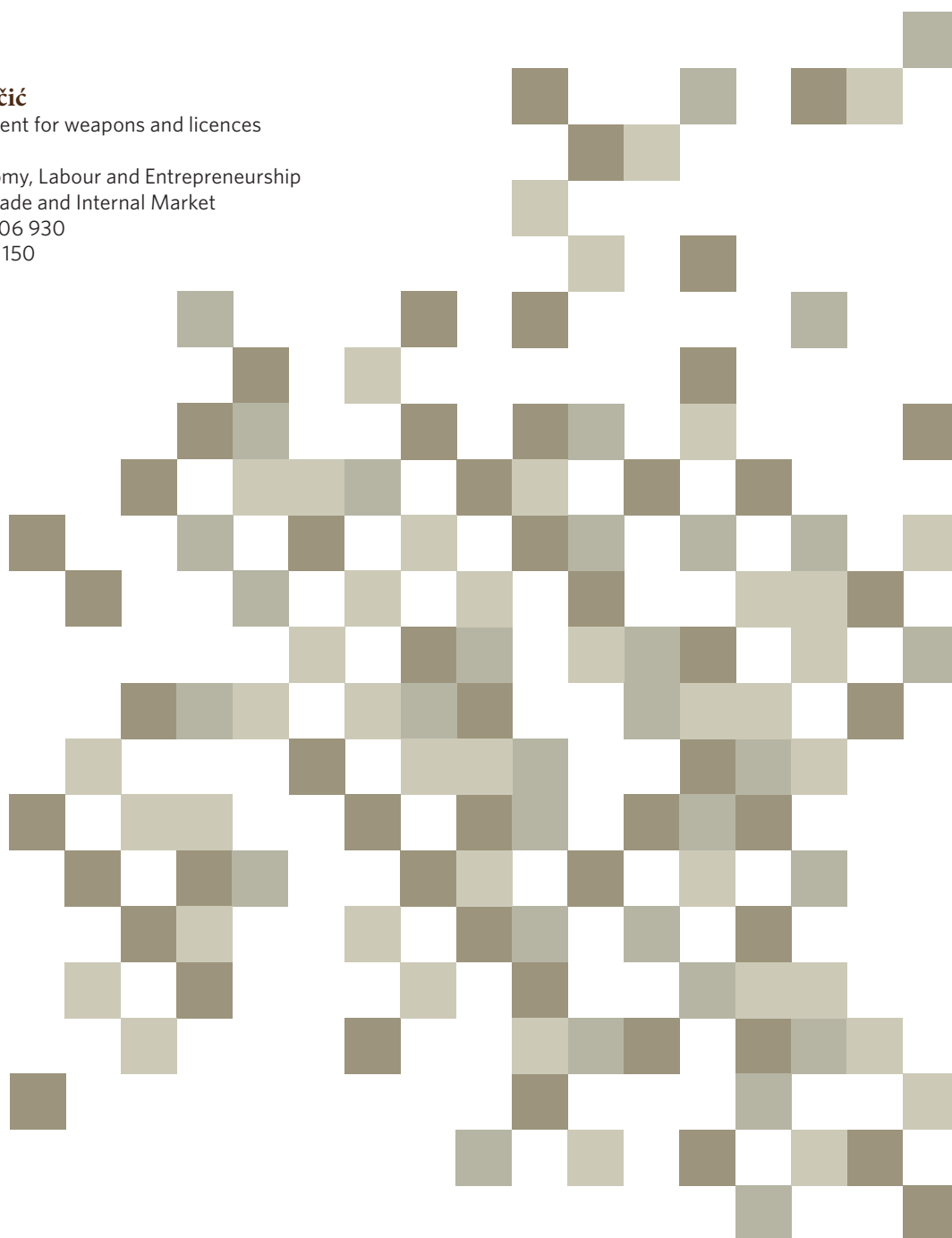
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# 1 | Introduction

**The Annual Report covers all the activities** invested by the relevant bodies of the Republic of Croatia in the course of 2010 with the aim that the system for import and export control of military goods and non-military lethal goods becomes as successful as possible.

It is worth pointing out that the import and export control of military goods in a given state is a reflection of various factors, including, most importantly, the issues of national security, foreign policy and economic interests. For a considerable number of years, the Republic of Croatia has been aiming to balance all of these factors in various ways.

With the signing of the Stabilisation and Association Agreement between the Republic of Croatia and the European Union, the Republic of Croatia undertook the obligation to harmonise its legislation with the EU *acquis communautaire*. As an active participant and party to all the globally relevant international legal instruments in the area of weapons control – such as the Treaty on the Non-Proliferation of Nuclear Weapons (NPT), the Comprehensive Nuclear-Test Ban Treaty (CTBT), the Chemical Weapons Convention (CWC), the Biological Weapons Convention (BWC), the Convention on Certain Conventional Weapons (CCW), the Hague Code of Conduct against Ballistic Missile Proliferation (HCOC), and the Ottawa Convention – the Republic of Croatia has a duty to regulate the import and export of military goods through an appropriate set of regulations.

Given the fact that the sphere of import and export control for military goods and non-military lethal goods for commercial purposes was only partially regulated in the past, it became clear that a new law should be reached, one that would ensure a comprehensive oversight of export and import of military goods and non-military lethal goods, as well as the provision of services for military goods.

In its National Security Strategy, adopted in March 2002, the Republic of Croatia expressed its readiness and interest to join international arrangements and regimes in the area of export supervision of the goods and technology subject to control, such as: the Wassenaar Arrangement on the control of export of conventional arms and dual-use goods (WA); the Missile Technology Control Regime (MTCR); the Nuclear Suppliers Group (NSG); and the Australia Group for the control of biological and chemical weapons (AG).

In accordance with the above, the Parliament of the Republic of Croatia voted in favour of the Law on the Export and Import of Military and Non-Military Lethal Goods in July 2008, and the Law was published in the official journal of the Republic of Croatia (Official Gazette [“Narodne novine”] no. 86/2008), while the application of the Law began on January 1, 2009.

Upon passing the Law on the Export and Import of Military and Non-Military Lethal Goods the Republic of Croatia became fully compliant with the requirements of the aforementioned

regimes including the European Union Code of Conduct on Arms Exports, adopted June 8, 1998, in connection to which the Government of the Republic of Croatia reached its Governmental Decision accepting the principles from the Code of Conduct on May 9, 2002.

On the basis of Article 5 of the mentioned Code, the Common Military List of the European Union has been accepted (OJ, 2008/C 98/01, 18 April 2008).

Furthermore, the mentioned Law is in full compliance with the joint action of EU Council with regard to the brokering in weapons trade dated 23 June 2003 (Council Common Position 2003/468/CFSP as of 23 June 2003 on the control of arms brokering), and with the Council Joint Action of 22 June 2000 concerning the control of technical assistance related to certain military end-uses (2000/401/CFSP) (OJ L 159, 30 June 2007).

The standards established by the UN Security Council Resolution 1540 on the non-proliferation of weapons of mass destruction have been built into the legal provisions. Namely, the UNSCR 1540 provides that the parties to the Resolution have the obligation to reach the regulations that would disable the proliferation of nuclear, chemical and biological weapons, and their means of delivery.

In addition to the mentioned harmonisation of the legislation of the Republic of Croatia with international regulations and obligations, the mentioned Law also regulated the provision of services, including brokering services and technical assistance for the goods included in the EU Military list.

In accordance with the provisions of Article 25 of the Law, the Ministry of Economy, Labour and Entrepreneurship created its first report on the licences issued for the export and import of goods from the List of Military Goods, which was completed in April 2011, covering 2010 as the previous year. Upon the adoption of the Report at the session of the Government of the Republic of Croatia, the Report was published on the official website of the Ministry of Economy, Labour and Entrepreneurship ([www.mingorp.hr](http://www.mingorp.hr)).

We should also point out that the Republic of Croatia began using the TRACKER program in 2009, donated by the US Government, with the aim of improving the practical implementation of the control of trade in military goods and technologies. All the state bodies participating in the process of issuance of licences for export and import of military goods and technologies and providing services for goods mentioned in the Military list as well as for the dual-use goods these types of goods have been networked with the Ministry of Economy, where the main database is located. As of January 1, 2010, the Customs Authority also became part of the system and its implementation, which completed the integration of the comprehensive export control system for arms and military equipment.

## 2 | National Legislation

The reaching of the Law on the Export and Import of Military Goods and Non-Military Lethal Goods created the opportunity to develop an effective universal control system for the export and import of military goods and non-military lethal goods, which is necessary in order to ensure that the Republic of Croatia meets its international obligations, and to ensure the competitiveness of Croatian companies engaged in the trade of military goods and non-military lethal goods in the global market.

The Law is harmonised with the Council Common Position on the control of arms brokering, the European Union Code of Conduct on arms exports, the Common Military List of the European Union, and the Council Joint Action concerning the control of technical assistance related to certain military end-uses.

### 2.1. Law on the Export and Import of Military and Non-Military Lethal Goods

The Law on export and import of Military and Non-Military Lethal Goods prescribes the conditions for the export and import of military goods and non-military lethal goods for commercial purposes, including technology and software in connection with such goods, providing services in regards of the military goods; the powers for the issuance of export and import licences for military goods and non-military lethal goods within the competence of the Ministry of Defence and the Ministry of Interior; the provision of services pertaining to military goods; the competences of state administration bodies participating in the implementation of the Law; the rights and obligations of exporters, importers and service providers; the conditions for pursuit of activities prescribed by the Law; and the control and administrative measures for those breaching the Law when national or foreign policy interests of the Republic of Croatia are endangered.

The definitions and concepts adopted from the European Union regulations, such as the definition of military goods and the definition of services, including brokering services and technical assistance, are built into the text of the Law.

Namely, military goods are goods mainly, but not solely constructed, created, assembled or modified for military purpose, including the technology and software connected to these goods, that are listed in the List of Military Goods. The List of Military Goods is being harmonised with the EU Common Military List each current year for the previous year.

The syntagm “mainly, but not solely constructed for military purpose” means that some goods stated in the List of Military Goods do not have a solely military character, just like a pistol is not constructed solely for military purpose, but is, however, specified in the Military List, and is used in the same manner by military persons, the police, security services and hunters, as well as by persons as a personal weapon. A similar situation can be seen in weapons and centrefire cartridges that are used both for military purposes and for hunting.

Non-military lethal goods are goods that are also subject to export or import control due to their technical characteristics and possibilities of use, and that are specified in the List of Non-Military Lethal Goods. The list of non-military lethal goods is a national list of the Republic of Croatia since each member state of the European Union has the possibility to create its own national list beside the EU Military list and independently decide which types of lethal goods will become part of its national list. Non-military lethal goods include hunting weapons and sporting arms and their parts; hunting and sporting ammunition and their parts; and commercial explosives, gunpowder and certain pyrotechnical products.

Article 2, paragraph 8 of the Law prescribes that the services shall mean the acquisition of gain, the transfer of rights, and other business activities pertaining to military goods, including brokering services and technical assistance.

The provision of services covered by this Article can only be done by the persons registered for the pursuit of production or brokering activity in the domestic and international market regarding the goods specified in the List of Military Goods, whose headquarters are located in the territory of the Republic of Croatia, and who are registered in the Register of Service Providers for Military Goods, which was not the case prior to the drafting of this Law.

Brokering services refer to the negotiation or contracting of business in connection with the purchase, sale or procurement of military goods specified in the List of Military Goods from one foreign country into any other foreign country, as well as the sale and purchase of military goods specified in the List of Military Goods that are located in one foreign country for transfer into another foreign country.

Brokering services do not include transportation, financial services, insurance and reinsurance, nor do they include advertising or promotion.

Technical assistance refers to any technical assistance in regard to repair, development, production, assembly, testing or maintenance of military goods, and any other form of technical assistance pertaining to military goods that may take a form of instruction, training, transfer of business knowledge, or transfer of expert or advisory services.

Technical assistance includes oral forms of assistance, written or voice instructions, trainings, transfers of business knowledge or skills, as well as consultancy services.

The Law prescribes that the licences for the export and import of military goods and non-military lethal goods, as well as those

for the provision of services for military goods, are issued by the Ministry of Economy, Labour and Entrepreneurship, on the basis of the consent of the Commission for the Provision of Consent for Export and Import of Military Goods and Non-Military Lethal Goods and for the Provision of Services for Military Goods. In order to receive Consent a consensus of all members of the Commission is necessary.

It is important to point out that the provisions of this Law pertain to the export and import of military goods and non-military lethal goods for commercial purposes, which means that the provisions of this Law do not pertain to the export and import of these goods for personal needs of individuals. Namely, the Law on Trade and Commerce (Official Gazette no. 87/2008) prescribes that domestic and foreign natural persons may freely carry into the country and receive from abroad, or carry out of the country and send abroad items that constitute personal luggage, victuals and items for their personal needs and the needs of their family members; items for the needs of their household and animals, in quantities that are not intended for resale. This provision allows persons to freely carry into and out of the country the permitted types of goods from the List of Military Goods and the List of Non-Military Lethal Goods, in accordance with the Law on Weapons, without the licence of the Ministry of Economy, Labour and Entrepreneurship.

In addition to what we have stated above, this Law furthermore prescribes that certain types of licences are issued by the Ministry of Defence, or by the Ministry of Interior: licences for the import of goods intended for the Armed Forces of the Republic of Croatia and the police; licences for the export of goods for the needs of the Armed Forces of the Republic of Croatia and the police with the intent of return of these goods back to the state; and licences for the export of goods on the basis of the donation of the Government of the Republic of Croatia. In addition to that, the licences for the export of goods on the basis of international military agreements signed by the Republic of Croatia are also issued by the Ministry of Defence.

Furthermore, the provisions of this Law make it possible to stop the transactions in connection with military goods, when there is doubt that these goods might be delivered to forbidden destinations, or to forbidden end users, which is necessary in order to ensure that the Republic of Croatia meets its international obligations. Namely, the Law enables the judicial bodies to adequately determine the penalties for those breaching this Law, with high prison sentences and fines prescribed for behaviour contrary to the provisions of the Law.

## 2.2. Bylaws

On the basis of the provisions of the Law on the Export and Import of Military and Non-Military Lethal Goods, the Government of the Republic of Croatia is passing the List of Military Goods, which is fully harmonised with the Common Military List of the European Union, and also the List of Non-Military Lethal Goods, which represents the national list.

It is worth pointing out that the goods specified in both of these Lists used to be subject to the licence regime even prior to the reaching of this Law, and that the licences of the Ministry of Economy, Labour and Entrepreneurship were needed for their export or import for commercial purposes in the past as well. However, given the fact that previous export and import procedures were not comparable with European Union procedures, the harmonisation of the national framework with the *acquis communautaire* became necessary.

### 2.2.1. Regulation Specifying the Goods Subject to Export and Import Licences

Given the fact that the Law prescribes that the Government of the Republic of Croatia shall adopt the List of Military Goods harmonised with the Common Military List of the European Union, as well as the List of Non-Military Lethal Goods for Commercial Purposes, following the proposal of the competent Ministry of Economy, the Government reached the Regulation Specifying the Goods Subject to Export and Import Licences. The constituent part of that Regulation is the **List of Military Goods** (APPENDIX IV of the Regulation), and the **List of Non-Military Lethal Goods** (APPENDIX V of the Regulation). The Regulation was published in the official journal of the Republic of Croatia – the Official Gazette [“Narodne novine”].

The List of Military Goods covers the total of 22 categories, outlined in the continuation of this chapter. In addition to the Official Gazette, this List was also published on the official Internet site of the Ministry of Economy, Labour and Entrepreneurship. The List of Military Goods is harmonised with the latest EU Military List on annual basis.

The categories (from ML1 to ML22) have the following meaning:

**ML1** - Smooth-bore weapons with a calibre of less than 20 mm, other arms and automatic weapons with a calibre of 12,7 mm or less and accessories, and specially designed components thereof;

**ML2** - Smooth-bore weapons with a calibre of 20 mm or more, other weapons or armament with a calibre greater than 12,7 mm, projectors and accessories, and specially designed components thereof;

**ML3** - Ammunition and fuse setting devices, and specially designed components thereof;

**ML4** - Bombs, torpedoes, rockets, missiles, other explosive devices and charges and related equipment and accessories, specially designed for military use, and specially designed components thereof;

**ML5** - Fire control, and related alerting and warning equipment, and related systems, test and alignment and countermeasure equipment, specially designed for military use, and specially designed components and accessories thereof;

**ML6** - Ground vehicles and components (tanks, armoured vehicles);

**ML7** - Chemical and biological toxic agents, riot control agents, radioactive materials, related equipment and materials;

- ML8** - Energetic materials – explosives, gunpowders and related SUBSTANCES;
- ML9** - Vessels of war, special naval equipment and accessories, and components therefor, specially designed for military use;
- ML10** - Aircrafts, lighter-than-air vehicles, unmanned airborne vehicles, aero-engines and aircraft equipment, related equipment and components, specially designed for military use;
- ML11** - Electronic equipment not controlled elsewhere in the Military List, and components therefor;
- ML12** - High velocity kinetic energy weapon systems and related equipment, and specially designed components therefor;
- ML13** - Armoured or protective equipment and constructions;
- ML14** - Specialized equipment for military training or for simulating military scenarios, simulators designed for training in the use of any firearm or weapon controlled by ML1 or ML2;
- ML15** - Imaging or countermeasure equipment, specially designed for military use, and specially designed components and accessories therefor;
- ML16** - Forgings, castings and other unfinished products the use of which in a controlled product is identifiable by material composition, geometry or function, and which are specifically designed for any products controlled by ML1 to ML4, ML6, ML9, ML10, ML12 or ML19.
- ML17** - Miscellaneous equipment, materials and libraries, and specially designed components
- ML18** - Equipment for the production of products referred to in the Military List;
- ML19** - Directed energy weapon systems;
- ML20** - Cryogenic and superconductive equipment;
- ML21** - Software;
- ML22** - Technology.

### 2.2.2. Ordinances

In accordance with the provisions of the Law, having in mind the aim to facilitate the monitoring of the overall export control system, the following bylaws have also been created:

- Ordinance on the Application Form for the Issuance of the Licence for Export or Import of Military and Non-Military Lethal Goods;
- Ordinance on the Format and Content of the Application for Global Export Licence of Military Goods specified under category ML 13;
- Ordinance on the Format and Content of the End-User Certificate for Import of Military and Non-Military Lethal Goods for Commercial Purposes;
- Ordinance on the Format and Content of the Export Licence or Import of Military and Non-Military Lethal Goods for Commercial Purposes;
- Ordinance on the Application Form for the Issuance of the Service Provision Licence;
- Ordinance on the Format and Content of the Service Provision Licence for Military Goods;

- Ordinance on the Content and Method of Keeping of the Register of Exporters and Importers of Military and Non-Military Lethal Goods;
- Ordinance on the Content and Method of Keeping of the Register of Service Providers for Military Goods.

All the outlined documents have been published in the Official Gazette, and they can be found on the official website of the Ministry of Economy, Labour and Entrepreneurship.

## 2.3. National Strategy and Action Plan for the Control of Small Arms and Light Weapons

In September 2009, the Government of the Republic of Croatia adopted the **National Strategy and Action Plan for the Control of Small Arms and Light Weapons**, which also covers the segment pertaining to the export control of small arms and light weapons.

The National Strategy is founded on the principles and goals of controlling small arms and light weapons, as elaborated in the National Security Strategy of the Republic of Croatia; the European Union Strategy to Combat the Illicit Accumulation and Trafficking of Small Arms and Light Weapons (SALW) and Their Ammunition; the Decision of the Government of the Republic of Croatia on the Acceptance of Principles from the European Union Code of Conduct on Arms Exports (now the Council Common Position), which determines the common rules for export control of military technology and equipment; Council Joint Action on the European Union's contribution to the fight against the destabilizing accumulation and spread of small arms and light weapons; and the Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their parts and Components. In accordance with the National Strategy, the National Commission was formed in order to control the efforts invested in the implementation of planned activities. The National Strategy and the action plan were published in the Official Gazette no. 113/2009.

# 3 | International Legal Instruments and Regimes

Having in mind the aim to create an efficient export control system, the Republic of Croatia is fulfilling all the obligations stemming from international treaties and export control regimes, as well as those belonging to the corresponding conventions and agreements. This fact is particularly relevant in the context of fight against terrorism and prevention of the proliferation of weapons of mass destruction, which makes it imperative to establish and consistently improve the legal and institutional framework pertaining to export control of goods and technology with military and dual-use characteristics.

## 3.1. International Export Control Regimes

As part of its National Security Strategy adopted in March 2002, the Republic of Croatia expressed its readiness and interest to join international arrangements and regimes in the area of export control of controlled goods and technology, such as: the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies (WA); the Missile Technology Control Regime (MTCR); the Nuclear Suppliers Group (NSG); and the Australia Group for the control of biological and chemical weapons (AG).

What follows is a brief description of the main characteristics of these regimes and their goals.

### 3.1.1. The Wassenaar Arrangement (WA)

The goal of the Wassenaar Arrangement is to promote transparency and greater responsibility in transfers of conventional arms and dual-use goods and technologies, and updating of the agreed control list of military goods and dual-use goods. The Wassenaar Arrangement currently includes 40 countries of the world, whose representatives are regularly meeting in Vienna, where the WA Secretariat is located, participating in various types of meetings (Expert Group – EG; General Working Group – GWG; Licensing and Enforcement Officers' Meeting – LEOM), as well as in the plenary session, which takes place in December each year. More information on the arrangement can be found at [www.wassenaar.org](http://www.wassenaar.org). The Republic of Croatia became a member of the Wassenaar Arrangement in June 2005, and Croatian experts have been regularly participating in the work of these bodies since then.

### 3.1.2. The Nuclear Suppliers Group (NSG)

Since its founding in 1975, the Nuclear Suppliers Group has aimed to decrease the global expansion of nuclear weapons through the control of export and transfers of materials that can be used in the development of nuclear weapons. The Republic of Croatia was accepted as member of the Nuclear Suppliers Group in June 2005. More information on the Group can be found at [www.nuclearsuppliersgroup.org](http://www.nuclearsuppliersgroup.org).

### 3.1.3. The Zangger Committee

The goal of the Zangger Committee is to prevent the redirection of nuclear materials for civilian purposes into nuclear weapons, or other nuclear explosive devices. The Republic of Croatia is an active participant and member of the Zangger Committee as of June 2006, and more details on the Committee can be found at [www.zanggercommittee.org](http://www.zanggercommittee.org).

### 3.1.4. The Australia Group (AG)

This control regime was established back in 1985, with the aim of preventing the spread of weapons of mass destruction, in particular chemical and biological agents, and equipment for dual-use goods (military and civilian). It currently includes 41 countries, including the member states of the European Union. The Republic of Croatia became a member of the Australia Group in April 2007, since then Croatian experts have been actively participating in the work of the Group. All the information regarding its work can be found at [www.australiagroup.net](http://www.australiagroup.net).

### 3.1.5. Missile Technology Control Regime (MTCR)

The goal of the Regime is to limit the proliferation of missiles and technology for missile production, and to maintain the control list of military and dual-use goods. Even though the Republic of Croatia submitted the request to be accepted as member of the Regime and given the fact that the country is formally fulfilling all the membership conditions, it still has not joined the Regime. More information on it can be found at [www.mtcr.info](http://www.mtcr.info).

Overall, we can conclude that the Republic of Croatia is a member of four out of five described regimes, the only exception being the MTCR regime.

## 3.2. International Treaties and Conventions

As we have already stated, export control of military goods and non-military lethal goods is undertaken with the purpose of ensuring national and international security. As part of that effort, the Republic of Croatia is fulfilling its international



obligations as a party and an active participant of the majority of important international treaties and conventions, and as the signatory of documents pertaining to the non-proliferation of weapons of mass destruction and conventional arms. Among a multitude of conventions and treaties of this nature, we shall only outline some:

- The Treaty on the Non-Proliferation of Nuclear Weapons (NPT)
- The Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction (CWC)
- The Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on Their Destruction (BTWC)
- The Convention on Cluster Munitions (which the Republic of Croatia ratified August 17, 2009)

# 4 | Export Control System Procedures

The Law on the Export and Import of Military and Non-Military Lethal Goods, as well as the corresponding Ordinances and instructions reached by the Minister of economy, labour and entrepreneurship, prescribe the procedures in regard to the export or import of military goods and non-military lethal goods, and in regard to the provision of services for military goods.

## 4.1. Registration

The activity of importing or exporting military goods and non-military lethal goods, as well as the activity of providing services for military goods, constitute the scope of work that, according to the Law, can be performed by legal entities and physical persons – craftsmen, registered in the Register of Exporters and Importers of Military Goods and Non-Military Lethal Goods for Commercial Purposes, or in the Register of Service Providers, which are maintained by the Ministry of Economy, Labour and Entrepreneurship.

The registration in these Registers is conducted on the basis of a written request, authorized by stamp and own signature of the responsible person in the legal entity, or of the physical person – craftsman, whereby the submitter of the request has the duty to provide all the prescribed documentation. On the basis of the delivered, legally valid documentation, the Minister of economy, labour and entrepreneurship is reaching a Decision on Registration in the Register. That entitles the submitter to submit the request for the export or import of goods specified in the List of Military Goods, in the List of Non-Military Lethal Goods, or for the provision of services for military goods.

Should a change of data arise, the person registered in any of the mentioned Registers has a duty to inform the Ministry in writing of any changes of data used in the process of registration in the Register that may have taken place, within 15 days of the change.

If new facts are determined, that were unknown at the time of the registration in the Register, the Law foresees the possibility of deletion from the Register. Such findings most frequently have to do with the following situations: the responsible person in a legal entity or a trade is issued a final judgment for a criminal offense against property; the responsible person is issued a security measure banning the undertaking of an activity which is included in the responsible person's business operations in whole or in part, or such a security measure is already in place; the person is not conducting business operations in accordance with the provisions of the Law; the

person is breaching international sanctions, or ceases to fulfil the conditions upon which the decision had been issued.

## 4.2. The Issuance of Licences

Requests for the issuance of the licence for export or import of military goods and non-military lethal goods, and for the provision of services for military goods, are submitted to the Ministry of Economy, Labour and Entrepreneurship on prescribed forms. The structure and the outlook of the forms are specified in the relevant ordinances published in the Official Gazette no. 1/2009. The forms can be downloaded in electronic form as well, from the official website of the Ministry of Economy, Labour and Entrepreneurship.

Article 6 of the Law prescribes that the licences for export or import of military goods and non-military lethal goods, and for the provision of services for military goods, are issued by the Ministry of Economy, Labour and Entrepreneurship, on the basis of the consent provided by the Commission for the Provision of Consent for Export and Import of Military Goods and Non-Military Lethal Goods and for the Provision of Services for Military Goods. The Commission includes the representatives of the competent Ministries of defence, internal affairs, foreign affairs and the economy. The consent is provided on the basis of a consensus of all the Commission's members. In the work of the Commission, each member or his/her deputy is responsible for the tasks belonging to the scope of work covered by that member's respective ministry. The Commission is appointed and dismissed by the Minister of Economy, on the basis of the proposal of the Ministers competent for defence, internal affairs, foreign affairs and the economy, and the Commission itself consists of one member and one deputy member from each of the competent ministries.

The Law also permits the issuance of general export licences for the export of military goods of the same type to one or more states, taking into consideration the type of goods, the duration of the export arrangement, and the country to which these goods are exported. However, a general export licence can be issued only for the export of samples of armoured or protective equipment, constructions and components from the category ML13 of the List of Military Goods, for the purpose of participating in tenders and exhibitions, with the duration of the licence limited to one year.

The introduction of such a provision allows the domestic producers of protective equipment to participate in the global market more competitively, given the fact that the procedure of issuance of licences requires a certain period of time, which has, in certain situations, thwarted the participation of Croatian producers of protective equipment in international tenders, thus inherently disabling the export of these goods.

Furthermore, the provision of the mentioned Law has given the possibility to the Ministry of Economy, Labour and Entrepreneurship to revoke the export licence once it is

issued, if it is established that one or more conditions on the basis of which the licence had been issued no longer exist, or if the licence had been issued on the basis of inaccurate or incomplete data. This provision is extremely important, because the Ministry can revoke the export licence in cases in which an export licence authorised the export of military goods to a country against which international restrictive measures were undertaken in the meantime or some new information were obtained due to which, in case the Commission had knowledge of during the time they were considering the request, the request would have not been authorised. Given the fact that, according to the provisions of the new Law, the Republic of Croatia is not liable for costs that may be incurred due to the revocation of the issued licence, one can assume that exporters and importers will be approaching their export-import affairs with greater responsibility and caution, paying more attention to persons and companies with whom they decide to engage in business relations. However, bearing in mind the fact that the exporter or importer is unable to reach all the needed information on the potential business partner, this Law enables them to ask the Ministry of Economy, Labour and Entrepreneurship for an opinion on whether business cooperation with a certain broker, purchaser, importer, end user, or a country which is the ultimate venue for the use of the goods, would be contrary to the provisions of this Law, prior to the signing of the contract on purchase or sale of military goods and non-military lethal goods. In order to avoid undesirable consequences, the Ministry has a duty to inform the interested person whether a certain person or a certain company is a desirable participant in the business affair.

### 4.3. Criteria for the Issuance of Licences

In the course of the authorisation process for the export of military goods, the Commission for the Issuance of Licences is handling its tasks on the basis of the **criteria** taken over from European Union acquis. Namely, back in May 2002, the Government of the Republic of Croatia accepted the European Union Code of Conduct on Arms Exports of June 1998, through its Decision on the Acceptance of Principles from the European Union Code of Conduct on Arms Exports. These criteria are now built into the Law on the Export and Import of Military and Non-Military Lethal Goods; for example, Article 21 of the Law prescribes that the Ministry will reject the request for the issuance of an export or import licence if the Commission determines that the issuance of the requested licence would be contrary to the foreign policy or economic interest of the Republic of Croatia, and contrary to the principles of the European Union Code of Conduct on Arms Exports, and if the issuance of the licence would endanger the fulfilment of the international obligations of the Republic of Croatia. In addition, the Law also specifies other reasons why a request may be rejected.

In addition to which, if a country belongs to the list of countries against whom restrictive measures are prescribed by the UN, EU, OSCE, or other international organizations whose restrictive measures the Republic of Croatia is implementing,

the request for export licence to that country can be accepted only for humanitarian use, or for the needs of peacekeeping forces.

The Republic of Croatia applies the identical criteria for the issuance of licences for the provision of services for military goods.

It is worth pointing out that the member states of the European Union have enacted into law the already mentioned Code of Conduct, by reaching the Council Common Position 2008/944/SFSP defining common rules governing control of exports of military technology and equipment, in December 2008.

### 4.4. Supervision and Control

In order to ensure that the Ministry receives credible and exact data, with the fundamental purpose of creating a database on requested, issued, implemented and revoked licences, the Law prescribes that the persons dealing with export or import of stipulated goods and services have the duty to inform in writing, the Ministry of Economy, Labour and Entrepreneurship of the performed export or import of goods and provided brokering services, within 15 days of the date of the performed export or import. In addition, the companies also have the duty to attach the documentation on the basis of which export or import was performed, which includes a copy of the customs declaration. Given the fact that the data in the customs declaration is quite frequently insufficient to verify on the basis of which licence the export or import was performed, the Law prescribes that the declarant has the duty to incorporate certain elements in the customs declaration that are necessary for the maintenance of the database and the drafting of annual reports. With regard to this, the declarant has the duty to specify in the customs declaration not only the full name and address of the exporter or importer, but also the number of the export or import licence on the basis of which the customs procedure was conducted; the name of the goods consistent with the name in the corresponding licence; the quantity of the goods expressed in units specified in the corresponding licence; the value of the goods specified in the currency that is specified in the corresponding licence; the CN code of the goods according to the Regulation on Customs Tariff; and, for the goods from the List of Military Goods, the ML code of the corresponding goods needs to be incorporated as well.

The aim of these provisions is to obligate the declarant to provide all the specific data which the customs officers need in the course of customs procedure, in order to undertake as quick and efficient customs control as possible. Namely, the specification of the ML code in the customs declaration draws the attention of the customs officer to the fact that the corresponding goods are subject to an export or import licence, which would be impossible to determine according to the CN code of the goods, given the fact that the List of Military Goods does not contain CN codes.

Attaining the Law on the Export and Import of Military and Non-Military Lethal Goods introduced a novelty in the supervision of whether obligations stemming from this Law are being met. Namely, in addition to the state bodies that are supervising the implementation of the Law in accordance with their competencies, the supervision is also undertaken by the body that issues the licences - the Ministry of Economy, Labour and Entrepreneurship - in collaboration with other bodies participating in the licence issuance procedure. These bodies include the Ministry of Defence, the Ministry of Interior, and the Ministry of Foreign Affairs and European Integration. The implementation of the supervision includes supervision prior to, during and upon the issuance of the licence, with a written report being created on the matter. This report is then delivered to the Minister of Economy, Labour and Entrepreneurship; if any irregularities are found, the Minister reports on these irregularities to the competent state bodies, for the purpose of instituting the proceedings.

# 5 | Cooperation in Export Control

## 5.1. International Cooperation

International cooperation, as a constituent element of the foreign and security policy of the Republic of Croatia, is developing and being implemented within the framework specified by the Program of the Government of the Republic of Croatia for the 2009 - 2011 Mandate, the National Security Strategy of the Republic of Croatia, and the guidelines and decisions of the President of the Republic, the Croatian Parliament, and the Government of the Republic of Croatia.

In the course of 2010, international cooperation was focused on intensifying the efforts aimed at NATO membership and full EU membership of the Republic of Croatia. Upon gaining membership in NATO, the focus of activities shifted towards full integration, articulation and implementation of credible, constructive and proactive participation in all the relevant processes, in particular those of a direct national interest. In addition to which, the priority remained to conduct all the activities aimed at the implementation of restrictive measures, and at improving and promoting international and regional stability and security.

In the sphere of regional cooperation, the emphasis was placed on the implementation of bilateral activities involving the neighbouring countries, and on the overall regional cooperation with the purpose of strengthening mutual trust and regional security.

In the sphere of the control of weapons of mass destruction, the Republic of Croatia has been implementing all of its obligations stemming from universal treaties and conventions in a consistent manner, including informal regimes. A bilateral workshop on the development of the national strategy against the proliferation of weapons of mass destruction was organised in cooperation with the United States. The Interministerial Working Group, established by the Decision of the Government of the Republic of Croatia, began working on the creation of the National Strategy and Action Plan against the proliferation of weapons of mass destruction.

The Republic of Croatia is consistently implementing its obligations stemming from the Ottawa Convention on the prohibition of anti-personnel mines, and from the Convention on Certain Conventional Weapons (CCCW) with its five Protocols; in addition to which, the country also actively participated in negotiations regarding the adoption of Protocol VI on the ban of cluster munitions. On the basis of the progress achieved in the demining of the territory of the Republic of Croatia, the UN General Secretary and parties to the Ottawa Convention have formally agreed to the extension of the demining period by 10 years, until 2019.

In June 2009, the Croatian Parliament reached the Law on the Confirmation of the Convention on Cluster Munitions. The ratification process was completed in August, as the Instrument of Ratification was delivered to the depositary - UN General Secretary. The convention will enter into force six months from the ratification of the thirtieth state; in other words, August 1, 2010. Croatia is looking forward to seeing as many countries included in this process as possible, given the exposure of the country to cluster munitions during the Homeland War. Through the ratification of the convention, the Republic of Croatia undertook the obligation not to produce, use nor export cassette munitions, as well as the obligation to destroy all the existing stockpiles within 8 years.

In June 2010, the representatives of the Ministry of Economy, Labour and Entrepreneurship, the Ministry of Foreign Affairs, and the customs authorities participated at the eleventh international conference on export control of weapons and dual-use goods, held in Kiev (Ukraine). The conference brought together experts from the entire world, focused on export control of weapons and dual-use goods, and it provided the state officials and civil servants with the opportunity to exchange experiences and evaluate current affairs, as well as the development of mechanisms that might improve the export control systems. Croatian system of export control of Military and dual-use goods was presented during the mentioned conference.

The republic of Croatia is also actively involved in activities implemented by the South Eastern and Eastern Europe Clearinghouse for the Control of Small Arms and Light Weapons (SEESAC).

It is worth pointing out that the Republic of Croatia will continue to actively participate in meetings of the representatives of countries in the region regarding the issues pertaining to the trade in arms and military equipment, with the aim of sharing its experiences in this sphere, in particular when it comes to the new legislation. That is all the more important given the fact that Croatia is currently the only country in its part of the region that is a member of the **Wassenaar Arrangement** (the international regime for the control of conventional arms and dual-use goods) as of June 2005, having in mind that virtually all the countries of the region have expressed the desire to become members of the Arrangement.

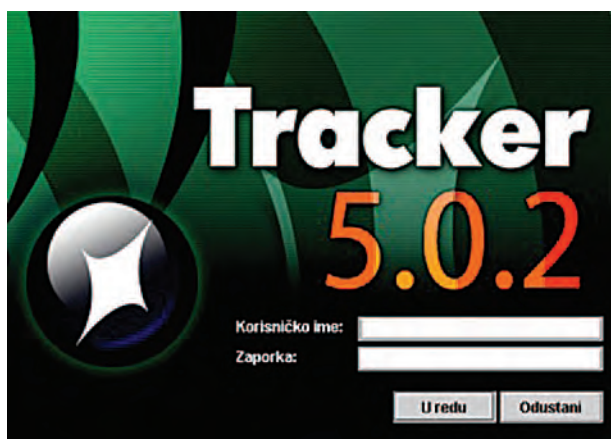
## 5.2. Implementation of the TRACKER program

Until 2009, Croatia was not using any specialized programs for export (import) control of the goods subject to the licence regime. Such a situation became problematic, given the fact that the volume of activities increased significantly in recent years, and also given the fact that, in the meantime, Croatia also accepted a range of obligations in regard to the delivery of data to international organizations (UN, OSCE, etc.).

Therefore, the Republic of Croatia accepted the donation of the US Government to the Ministry of Economy, Labour and Entrepreneurship, as the competent institution for the issuance of export and import licences for military goods and dual-use goods, in the form of the program entitled "TRACKER", together with the corresponding IT equipment, with the aim of facilitating the better implementation of export control. Following up on that donation, the program installation took place in the course of 2008, and the capacities of the program were presented to the representatives of state bodies and agencies participating in the process of issuance of licences.

The process of adjusting the program to local circumstances and its overall implementation took place in three phases. In phase one, the software was adjusted, with exit documents generated in conformity with the format and the content required by the domestic legislation. In the second phase, two staff members of the Trade Policy (nowadays Department for Export Control) were trained for the work in the TRACKER system, the database was tested and a manual for data input into the system was produced. In the final, third phase, individual solutions were tested, and noticed shortcomings were corrected. On January 1, 2009, the actual implementation of the program began.

The TRACKER program serves for the monitoring of the export and import of arms and military equipment, as well as dual-use goods. It is harmonised with the *acquis communautaire* of the European Union, and it includes the possibility of creating a database and issuing the licences on standardized forms. The interface is translated into Croatian, and exit documents are harmonised with the current legislation. The program is continuously being improved (the Republic of Croatia is currently using the version 5.0.2), and it can be installed on a range of IT platforms. The design of the start page of the program is shown in the **image 1**.



**Image 1.** Start page of the TRACKER program

### 5.3. Cooperation with the Industry

Successful cooperation with the industry is one of the key elements of the export control system. It covers various forms

of assistance to companies exporting their products, and the most important forms of assistance include organizing specialised seminars and workshops, as well as continuous education and information efforts regarding all the legislative novelties in this area.

#### 5.3.1. Seminars and Education

During 2010 the Ministry of Economy, Labour and Entrepreneurship was continuously informing the interested companies and individuals on their obligations and opportunities stemming from the Law on the Export and Import of Military and Non-Military Lethal Goods, and also about the Internal Control Program (PUK) in order to ensure that the companies can export and import their products with as few obstacles as possible and provide services for the goods from the Military List.



**Image 2.** Participants of the Economy and Government Forum in Zagreb (February 2010)

Since the Internal Control Program is considered to be an important international standard in the area of export control of dual-use goods and import and export of military goods, the introduction of Internal Control Program can enhance the competitiveness of the Croatian companies at the international market.

Thus, as early as February 2010, in the organisation of The Ministry of Economy, Labour and Entrepreneurship and under the sponsorship of the USA government organised an "Economy and Government Forum on supervision of export of strategic goods and about the new Croatian Internal Control Program" in the premises of the Ministry. Sixty companies which are manufacturing, importing or exporting goods from the Military list and the List of Non-Military lethal goods and are producing dual-use goods, participated the Forum.

#### 5.3.2. Website of the Ministry of Economy, Labour and Entrepreneurship

The Ministry of Economy, Labour and Entrepreneurship, provide particular care to the updating of their websites. In that respect, all the information on current events in the sphere of export control, seminar announcements, and announcements on other forms of education, can be found at the official Internet

site of the Ministry of Economy, Labour and Entrepreneurship. The address of the site is [www.mingorp.hr](http://www.mingorp.hr), and the design of the cover page can be seen in the **image 3**.



**Image 3.** Start page of the export control

The site is continuously updated, which means that interested companies can find all the data they need at any point in time, including the information on relevant laws and bylaws, and they can also download the electronic version of the required forms, in case they need them.

### 5.3.3. Internal Control Program

The Ministry of Economy, Labour and Entrepreneurship, with the assistance of the US Government, presented the program entitled PUK to domestic companies (PUK is the Croatian acronym for the **Internal Control Program**). This program is expected to contribute to the strengthening of the comprehensive system of export control, while at the same time decreasing the potential financial losses of companies which might be incurred on the basis of poor export decisions. This Program was donated by the Office for Export Control and Related Border Security (EXBS Office) of the US Government

This is a new and advanced Internet tool, assisting the companies in the process of export of goods to adhere to the Croatian and international regulations on export control. The PUK program is free of charge, and it is available at <http://icp.mingorp.hr/>. The design of the start page is shown in the **image 4**.



**Image 4.** Start page of the Internal Control Program

The Croatian companies will be using this program on a voluntary basis.

The first presentation of the program to companies in the Republic of Croatia took place in the course of the Industry-Government Forum on Strategic Trade Controls.

Given the fact that the Internal Control Program is considered to be an important international standard in the sphere of export control of dual-use goods, and in the sphere of import and export of military goods, it is likely that the introduction of the Internal Control Program will raise the competitiveness of Croatian companies in the international market.



**Image 5.** Presentation of PUK program to the industry

## 6 | Licences issued and used in 2010

In accordance with the provisions of Article 25 of the Law on the Import and Export of Military Goods and Non-Military Lethal Goods for Commercial Purposes, the Ministry of Economy, Labour and Entrepreneurship completed its first **Annual Report** in April 2010, detailing the licences issued for the export or import of military goods and non-military lethal goods for the period January 1 - December 31, 2010 and also about the licences issued in 2009 and used in 2010. Upon the adoption of the Report at the session of the Government of the Republic of Croatia, the Report was published on the official website of the Ministry of Economy, Labour and Entrepreneurship.

Companies registered in the Register of Exporters and Importers of Military and Non-Military Lethal Goods up until the 31.12.2010	78
Companies registered in the Register of Service Providers for Military Goods up until the 31.12.2010	11

**Table 1.** Number of companies in the Registers

The export and import of military goods and non-military lethal goods can only be performed by legal entities and natural persons - craftsmen, registered in the Register of Exporters and Importers of Military and Non-Military Lethal Goods. In the year 2010, 14 companies were registered in this Register which means that up until the end of 2010 a total of 78 companies (Appendix 12) were registered in the Register whilst there was only one company registered in the Register of Service Providers for Military Goods in 2010 which means that up until the end of 2010 a total of 11 companies were registered in the mentioned Register. (Appendix 13).

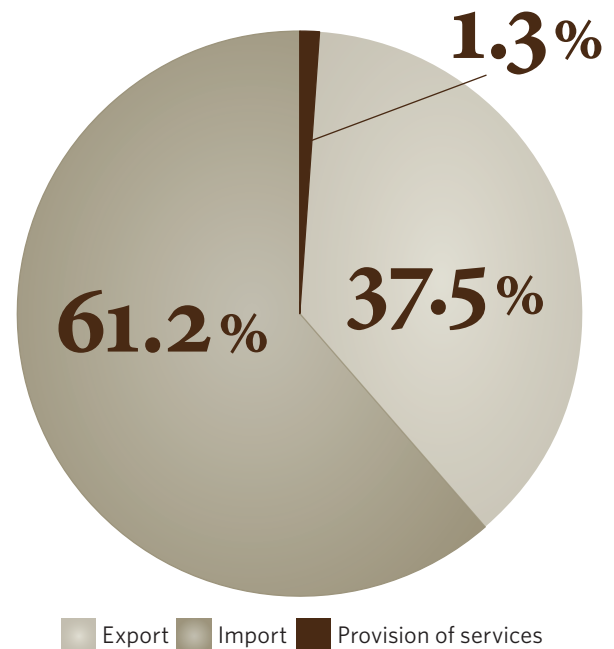
	Number of licences issued in 2010
Export	278
Import	454
Provision of services	10

**Table 2.** Overview of the total of licences issued in 2010

It is obvious from the Report that the Ministry of Economy, Labour and Entrepreneurship issued a **total of 742 licences**

**out of which 278 export licences, 454 import licences and 10 licences for the provision of services.**

Graphical outline of issued licences in percentage points is shown on the **Chart 1**.



**Chart 1.** Number of issued licences in 2010

Of the total number of licences, there were 126 licences issued for the export of goods specified in the List of Military Goods (Appendix 1); 179 licences for the import of goods from the List of Military Goods (Appendix 2); 54 licences for the export of goods listed in the List of Non-Military Lethal Goods (Appendix 3); 268 licences for the import of goods listed in the List of Non-Military Lethal Goods (Appendix 4); 38 licences for the temporary export of goods from the List of Military Goods (Appendix 5); and 7 licences for the temporary import of goods from the List of Military Goods (Appendix 6).

Furthermore, the Ministry issued 60 general licences for the export of military helmets and accompanying equipment, belonging to the category ML13 of the List of Military Goods, for the purpose of presentation at fairs and tenders. On the basis of the Commission's opinion, the Ministry rejected a total of 12 requests out of which there were 9 requests for export of military goods and 3 requests for import of lethal non-military goods. The requests were mostly rejected because the companies did not fulfil the conditions prescribed by Law, or because they were not registered in the relevant registers; there were also several cases in which the companies were unable to deliver all the prescribed documentation.

**Chart 2** contains the overview of licences for the export of military goods per country.

Given the fact that the licences are issued with a validity period of up to 6 months, a considerable volume of approved licences is ultimately unused, or used only partially. The insight into data received from the Customs Administration led to the



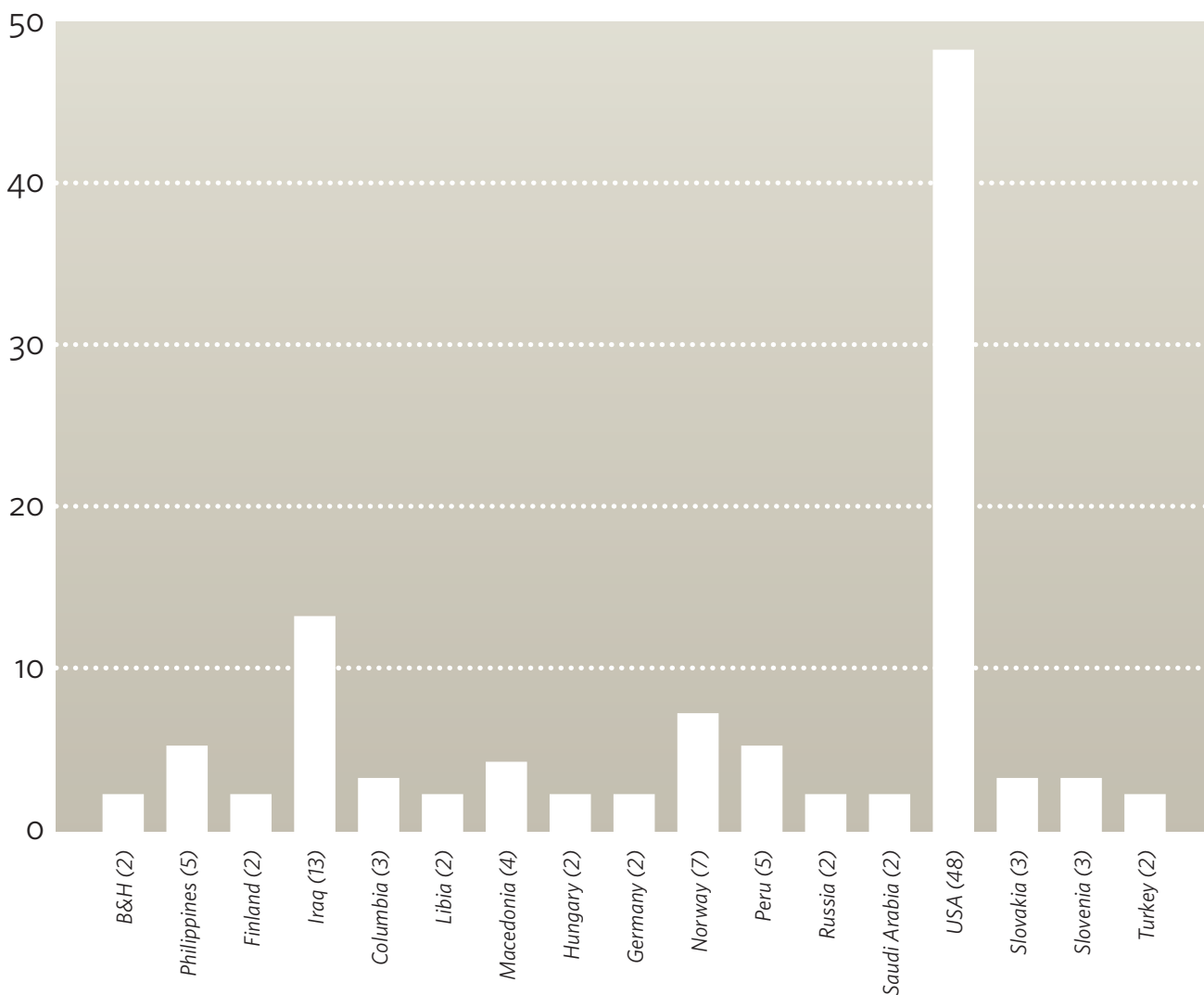
	List of Military Goods	List of Non-Military Lethal Goods	Temporary export / import	General licence
Export	126	54	38	60
Import	179	268	7	/

**Table 3.** Analysis of issued export and import licences per category

conclusion that the biggest volume of the requested, yet unused export licences pertains to the export of Croatian pistols and their parts to the US. Namely, the Croatian exporter is claiming his export demands upon the US import licences whilst at the same time is not able to deliver approved quantities within the six months deadline which actually represents the validity date for Croatian licences.

However, it is important to emphasize that the information in attached tables on used licences were received from Customs

Administration via TRACKER Program. Namely, as of January 1, 2010 Customs Administration started using TRACKER Program that is used by the Ministry of Economy, Labour and Entrepreneurship for the issuance of licences. Mentioned Program has enabled a precise and high-quality analysis of the licences issued by the Ministry that relates to the export or import of military goods and non-military lethal goods, as well as for the export of dual-use goods.



**Chart 2.** Overview of licences issued for export of military goods per countries (countries with two or more licences)

## 7 | Appendices

1. Export of military goods in 2010
2. Import of military goods in 2010
3. Export of non-military lethal goods in 2010
4. Import of non-military lethal goods in 2010
5. Temporary export of military goods in 2010
6. Temporary import of military goods in 2010
7. Provision of services for military goods in 2010
8. Export of military goods (licences issued in 2009 and used in 2010)
9. Import of military goods (licences issued in 2009 and used in 2010)
10. Export of non-military lethal goods (licences issued in 2009 and used in 2010)
11. Import of non-military lethal goods (licences issued in 2009 and used in 2010)
12. List of companies registered in the Register of Importers and Exporters of Military and Non-Military Lethal Goods
13. List of companies registered in the Register of Service Providers in the Republic of Croatia
14. Law on the Export and Import of Military and Non-Military Lethal Goods
15. Review of implementation of European Union legislation on export control in the Republic of Croatia
16. Review of export of military goods according to the methodology of the European Union

## Appendix 1 | Export of military goods in 2010

Export to	Number of licences	Description of goods	ML code
Argentina	1	Pistols	ML1a
TOTAL	1		
Bangladesh	1	Helmets	ML13c
TOTAL	1		
Belarus	1	Helmets	ML13c
TOTAL	1		
Bosnia and Herzegovina	1	Projector components	ML2
Bosnia and Herzegovina	1	Projector components	ML2a
TOTAL	2		
Philippines	1	Parts for pistols	ML1d
Philippines	1	Parts for pistols	ML1a
Philippines	1	Pistols	ML1a
Philippines	1	Parts of rifles	ML1d
Philippines	1	Rifles	ML1a
TOTAL	5		
Finland	1	Parts for tanks	ML6
Finland	1	Parts for pistols	ML1d
TOTAL	2		
Guatemala	1	Pistols	ML1a
TOTAL	1		
Honduras	1	Pistols	ML1a
TOTAL	1		
Iraq	2	Rifles	ML1a
			ML1a

Authorised value	Authorised quantity	Used quantity	Used value
195.250,00 EUR	750 SET	141 SET	38.836,50 EUR
195.250,00 EUR			38.836,50 EUR
1.344.000,00 EUR	12.000 PCS	unused	unused
1.344.000,00 EUR			0,00 EUR
53.460,00 EUR	396 PCS	unused	unused
53.460,00 EUR			0,00 EUR
43.826,68 EUR	15.657 PCS	15.657 PCS	43.826,68 EUR
31.590,13 EUR	9.261 PCS	9.261 PCS	31.590,13 EUR
75.416,81 EUR			75.416,81 EUR
7.360,00 EUR	670 PCS	unused	unused
220,50 EUR	50 PCS	unused	unused
74.400,00 EUR	301 PCS	unused	unused
18.000,00 EUR	1.000 PCS	unused	unused
350.000,00 EUR	350 PCS	unused	unused
449.980,50 EUR			0,00 EUR
107.314,12 EUR	21 PCS	21 PCS	107.314,12 EUR
566,00 EUR	55 PCS	unused	unused
107.880,12 EUR			107.314,12 EUR
26.575,00 EUR	100 SET	unused	unused
26.575,00 EUR			0,00 EUR
1.160.000,00 USD	4.000 SET	unused	unused
1.160.000,00 USD			0,00 EUR
334.000,00 USD	200 SET	unused	unused
57.500,00 USD	16 PCS	unused	unused

Export to	Number of licences	Description of goods	ML code
Iraq	4	Pistols	ML1a
			ML1a
Iraq	2	Grenade launcher	ML2a
Iraq	2	Anti material rifle	ML2a
Iraq	2	Ammunition	ML3a
Iraq	1	Grenades	ML4a
TOTAL	13		
Iran	1	Helmets	ML13c
TOTAL	1		
Israel	1	Weapons sights	ML2c
TOTAL	1		
Kazakhstan	1	Helmets	ML13c
TOTAL	1		
Kenya	1	Pistols	ML1a
TOTAL	1		
Kyrgyzstan	1	Helmets	ML13c
TOTAL	1		
Colombia	3	Helmets	ML13c
TOTAL	3		
Libya	1	Canon barrel	ML9a2a
Libya	1	Ship	ML9a
TOTAL	2		
Macedonia	1	Gas proof suit	ML7f1
Macedonia	1	Chemical detector	ML7g
Macedonia	1	Biological identifier	ML7g

Authorised value	Authorised quantity	Used quantity	Used value
4.323.000,00 USD	11.000 SET	1.000 SET	393.000,00 USD
10.760.000,00 USD	25.000 PCS	5.000 PCS	2.210.000,00 USD
30.000,00 USD	9 PCS	4 PCS	10.000,00 USD
45.400,00 USD	3 PCS	1 PCS	21.100,00 USD
79.432,68 USD	4.372 PCS	172 PCS	32,68 USD
61.080,00 EUR	1.000 PCS	1.000 PCS	61.080,00 EUR
61.080,00 EUR			61.080,00 EUR
15.629.332,68 USD			2.634.132,68 USD
624.000,00 EUR	6.000 PCS	2.000 PCS	208.000,00 EUR
624.000,00 EUR			208.000,00 EUR
20.480,00 EUR	40 PCS	40 PCS	20.480,00 EUR
20.480,00 EUR			20.480,00 EUR
56.700,00 EUR	420 PCS	420 PCS	56.700,00 EUR
56.700,00 EUR			56.700,00 EUR
6.469,00 EUR	20 PCS	unused	unused
6.469,00 EUR			0,00 EUR
2.700,00 EUR	20 PCS	20 PCS	2.700,00 EUR
2.700,00 EUR			2.700,00 EUR
284.395,00 EUR	2.473 PCS	2.473 PCS	284.395,00 EUR
284.395,00 EUR			284.395,00 EUR
220,00 EUR	1 PCS	1 PCS	220,00 EUR
19.163.387,39 EUR	1 PCS	1 PCS	19.163.387,39 EUR
19.163.607,39 EUR			19.163.607,39 EUR
28.100,00 EUR	5 SET	5 SET	28.100,00 EUR
74.125,00 EUR	5 PCS	5 PCS	74.125,00 EUR
94.400,00 EUR	2 PCS	2 PCS	94.400,00 EUR

Export to	Number of licences	Description of goods	ML code
Macedonia	1	Tent	ML7f1
TOTAL	4		
Malaysia	1	Pistols	ML1a
TOTAL	1		
Malta	1	Pistols	ML1a
TOTAL	1		
Hungary	2	Pistols	ML1a
TOTAL	2		
Namibia	1	Pistols	ML1a
TOTAL	1		
Germany	2	Helmets	ML13c
TOTAL	2		
Norway	1	Military telephones	ML11a
Norway	6	Military telephones	ML11a
TOTAL	7		
Oman	1	Helmets	ML13c
TOTAL	1		
Peru	2	Helmets	ML13c
Peru	3	Helmets	ML13c
TOTAL	5		
Poland	1	Helmets	ML13c
TOTAL	1		
Russia	2	Helmet equipment	ML13c
TOTAL	2		

Authorised value	Authorised quantity	Used quantity	Used value
130.000,00 EUR	1 SET	1 SET	130.000,00 EUR
326.625,00 EUR			326.625,00 EUR
4.708,00 EUR	15 SET	unused	unused
4.708,00 EUR			0,00 EUR
41.050,00 EUR	150 SET	unused	unused
41.050,00 EUR			0,00 EUR
43.925,00 EUR	178 SET	22 SET	5.660,00 EUR
43.925,00 EUR			5.660,00 EUR
40.000,00 USD	100 SET	100 SET	40.000,00 USD
40.000,00 USD			40.000,00 USD
9.450,00 EUR	90 PCS	90 PCS	9.450,00 EUR
9.450,00 EUR			9.450,00 EUR
463.000,00 EUR	200 PCS	80 PCS	185.200,00 EUR
631.558,00 NOK	200 PCS	69 PCS	130.402,00 NOK
463.000,00 EUR			185.200,00 EUR
631.558,00 NOK			130.402,00 NOK
540.000,00 EUR	5.000 PCS	unused	unused
540.000,00 EUR			0,00 EUR
136.620,00 USD	495 PCS	300 PCS	82.800,00 USD
1.021.165,00 EUR	7.550 PCS	7.355 PCS	967.345,00 EUR
1.021.165,00 EUR			967.345,00 EUR
136.620,00 USD			82.800,00 USD
80.010,00 EUR	762 PCS	762 PCS	80.010,00 EUR
80.010,00 EUR			80.010,00 EUR
105.000,00 EUR	7.000 PCS	270 PCS	4.050,00 EUR
105.000,00 EUR			4.050,00 EUR



Export to	Number of licences	Description of goods	ML code
Saudi Arabia	2	Helmets	ML13c
<b>TOTAL</b>	<b>2</b>		
USA	24	Pistols	ML1a
USA	6	Parts for pistols	ML1d
USA	4	Parts for pistols	ML1a
USA	1	Parts of rifles	ML1d
USA	2	Parts of rifles	ML1a
USA	2	Missile	ML3a
USA	2	Missile ignitor	ML3b
USA	6	Ammunition	ML3a
USA	1	Rifles	ML1a
<b>TOTAL</b>	<b>48</b>		
Slovakia	2	Parts for pistols	ML1d
Slovakia	1	Pistols	ML1a
<b>TOTAL</b>	<b>3</b>		
Slovenia	2	Pistols	ML1a
Slovenia	1	Helmet equipment	ML13c
<b>TOTAL</b>	<b>3</b>		
Spain	1	Pistols	ML1a
<b>TOTAL</b>	<b>1</b>		
Thailand	1	Pistols	ML1a
<b>TOTAL</b>	<b>1</b>		
Turkey	2	Electrical ignition	ML4a
<b>TOTAL</b>	<b>2</b>		

Authorised value	Authorised quantity	Used quantity	Used value
383.150,00 EUR	3.950 PCS	3.950 PCS	383.150,00 EUR
383.150,00 EUR			383.150,00 EUR
425.321.684,00 USD	2.207.901 SET	184.563 SET	35.945.410,00 USD
4.655.200,00 USD	25.300 PCS	1 PCS	200,00 USD
38.134.341,00 USD	5.518.600 PCS	89.310 PCS	282.874,75 USD
82.978.397,00 USD	8.955.600 PCS	99.871 PCS	154.666,77 USD
2.400.000,00 USD	400.000 PCS	unused	unused
2.260.000,00 USD	535.000 PCS	unused	unused
324.500,00 USD	5.500 PCS	4.998 PCS	294.882,00 USD
148.500,00 USD	5.500 PCS	unused	unused
7.628.016,00 USD	133.470.320 PCS	3.532.223 PCS	605.708,35 USD
150.300,00 USD	5.010 PCS	unused	unused
564.000.938,00 USD			37.283.741,87 USD
6.624,00 EUR	845 PCS	120 PCS	1.005,00 EUR
131.700,00 EUR	495 SET	47 SET	12.130,00 EUR
138.324,00 EUR			13.135,00 EUR
113.555,00 EUR	420 SET	48 SET	13.340,00 EUR
4.200,00 EUR	280 PCS	280 PCS	4.200,00 EUR
117.755,00 EUR			17.540,00 EUR
27.040,00 EUR	100 SET	unused	unused
27.040,00 EUR			0,00 EUR
132.850,00 EUR	500 SET	unused	unused
132.850,00 EUR			0,00 EUR
572.764,50 EUR	19.950 PCS	6.450 PCS	194.029,50 EUR
572.764,50 EUR			194.029,50 EUR

Export to	Number of licences	Description of goods	ML code
UAE	2	Helmets	ML13c
TOTAL	2		
TOTAL	126		

Authorised value	Authorised quantity	Used quantity	Used value
3.538.610,00 EUR	22.927 PCS	22.927 PCS	3.538.610,00 EUR
3.538.610,00 EUR			3.538.610,00 EUR
30.017.420,32 EUR			25.743.334,32 EUR
580.966.890,68 USD			40.040.674,55 USD
631.558,00 NOK			130.402,00 NOK

## Appendix 2 | Import of military goods in 2010

Import from	Number of licences	Description of goods	ML code
Austria	2	Forging mandrel for gun barrel hammer (tools)	ML18a
Austria	23	Rifles	ML1a
Austria	4	Forging mandrel for gun barrel	ML18a
Austria	4	Pistols	ML1a
Austria	6	Ammunition	ML3a
Austria	2	Parts for pistols	ML1d
Austria	2	Parts of rifles	ML1a
Austria	3	Parts of rifles	ML1d
<b>TOTAL</b>	<b>46</b>		
Belgium	12	Rifles	ML1a
Belgium	2	Ammunition	ML3a
Belgium	1	Parts of rifles	ML1a
<b>TOTAL</b>	<b>15</b>		
Bosnia and Herzegovina	1	Ammunition	ML3a
<b>TOTAL</b>	<b>1</b>		
Brasil	1	Ammunition	ML3a
<b>TOTAL</b>	<b>1</b>		
France	1	Rifles	ML1a
<b>TOTAL</b>	<b>1</b>		
Italy	1	Parts of rifles	ML1a
Italy	6	Rifles	ML1a
Italy	2	Ammunition	ML3a
Italy	1	Parts for pistols	ML1d
Italy	1	Parts of rifles	ML1d

Authorised value	Authorised quantity	Used quantity	Used value
27.107,20 EUR	16 PCS	8 PCS	13.553,60 EUR
514.970,41 EUR	458 PCS	95 PCS	82.550,24 EUR
49.895,10 EUR	35 PCS	33 PCS	43.930,90 EUR
6.696,34 EUR	16 PCS	16 PCS	6.696,34 EUR
143.600,26 EUR	158.920 PCS	87.260 PCS	88.373,82 EUR
1.771,60 EUR	188 PCS	unused	unused
32.622,54 EUR	60 PCS	10 PCS	5.897,78 EUR
4.715,00 EUR	57 PCS	18 PCS	1.586,00 EUR
781.378,45 EUR			242.588,68 EUR
319.130,00 EUR	503 PCS	255 PCS	179.912,66 EUR
70.600,00 EUR	170.000 PCS	unused	unused
13.300,00 EUR	370 PCS	177 PCS	5.008,00 EUR
403.030,00 EUR			184.920,66 EUR
1.700,00 EUR	10.000 PCS	unused	unused
1.700,00 EUR			0,00 EUR
23.851,66 EUR	119.000 PCS	unused	unused
23.851,66 EUR			0,00 EUR
5.346,00 EUR	4 PCS	unused	unused
5.346,00 EUR			0,00 EUR
780,50 EUR	35 PCS	unused	unused
59.717,00 EUR	72 PCS	20 PCS	25.047,55 EUR
15.600,00 EUR	80.000 PCS	50.000 PCS	7.500,00 EUR
3.016,00 EUR	600 PCS	unused	unused
2.070,00 EUR	21 PCS	unused	unused

Import from	Number of licences	Description of goods	ML code
Italy	1	Weapons sights	ML1d
TOTAL	12		
Israel	1	Tent	ML7f1
TOTAL	1		
China	1	Ballistic panel	ML13a
TOTAL	1		
Lithuania	1	Ammunition	ML3a
TOTAL	1		
Luxembourg	1	Gas proof suit	ML7f1
TOTAL	1		
Hungary	1	Parts of rifles	ML1d
Hungary	1	Rifles	ML1a
Hungary	1	Pistols	ML1a
Hungary	1	Grenade launcher	ML2a
TOTAL	4		
Montenegro	1	Airplane	ML10b
Montenegro	1	Parts of rifles	ML1d
Montenegro	1	Rifles	ML1a
Montenegro	1	Pistols	ML1a
Montenegro	1	Grenade launcher	ML2a
Montenegro	1	Airplane	ML10a
TOTAL	6		

Authorised value	Authorised quantity	Used quantity	Used value
3.180,00 USD	200 PCS	200 PCS	3.180,00 USD
81.183,50 EUR			32.547,55 EUR
3.180,00 USD			3.180,00 USD
89.775,00 EUR	1 SET	1 SET	89.775,00 EUR
89.775,00 EUR			89.775,00 EUR
440,00 USD	10 PCS	10 PCS	440,00 USD
440,00 USD			440,00 USD
7.200,00 EUR	30.000 PCS	30.000 PCS	7.200,00 EUR
7.200,00 EUR			7.200,00 EUR
4.125,00 EUR	5 SET	5 SET	4.125,00 EUR
4.125,00 EUR			4.125,00 EUR
1.744,00 EUR	11 PCS	11 PCS	1.744,00 EUR
3.600,00 EUR	3 SET	3 SET	3.600,00 EUR
1.545,00 EUR	6 SET	6 SET	1.545,00 EUR
1.000,00 EUR	1 SET	1 SET	1.000,00 EUR
7.889,00 EUR			7.889,00 EUR
250.500,00 USD	5 PCS	unused	unused
1.744,00 EUR	11 PCS	11 PCS	1.744,00 EUR
3.600,00 EUR	3 SET	3 SET	3.600,00 EUR
1.545,00 EUR	6 SET	6 SET	1.545,00 EUR
1.000,00 EUR	1 SET	1 SET	1.000,00 EUR
100.200,00 USD	2 PCS	2 PCS	100.200,00 USD
7.889,00 EUR			7.889,00 EUR
350.700,00 USD			100.200,00 USD



Import from	Number of licences	Description of goods	ML code
Germany	3	Pistols	ML1a
Germany	3	Tools	ML18a
Germany	2	Laser module	ML1d
Germany	7	Rifles	ML1a
Germany	1	Ammunition	ML3a
Germany	1	Ballistic panel	ML13d
Germany	2	Parts of rifles	ML1d
Germany	1	Parts of rifles	ML1a
Germany	1	Parts of rifles	ML2c
<b>TOTAL</b>	<b>21</b>		
Norway	1	Explosives	ML8a13a
<b>TOTAL</b>	<b>1</b>		
Poland	1	Pistols	ML1a
Poland	1	Rifles	ML1a
<b>TOTAL</b>	<b>2</b>		
Portugal	2	Rifles	ML1a
<b>TOTAL</b>	<b>2</b>		
Czech Republic	2	Rifles	ML1a
Czech Republic	4	Pistols	ML1a
Czech Republic	1	Parts of rifles	ML1d
Czech Republic	2	Parts for pistols	ML1d
Czech Republic	11	Ammunition	ML3a
<b>TOTAL</b>	<b>20</b>		

Authorised value	Authorised quantity	Used quantity	Used value
7.852,00 EUR	14 PCS	unused	unused
18.440,00 EUR	12 SET	unused	unused
5.800,00 EUR	40 PCS	10 PCS	1.450,00 EUR
8.064,90 EUR	8 SET	8 SET	8.064,90 EUR
135.188,00 EUR	251 PCS	140 PCS	61.076,51 EUR
20.911,40 EUR	9.600 PCS	unused	unused
1.032,96 EUR	4 PCS	1 PCS	1.032,96 EUR
2.355,50 EUR	2 SET	2 SET	2.355,50 EUR
753,00 EUR	8 PCS	2 PCS	197,00 EUR
1.889,49 EUR	179 PCS	16 PCS	733,54 EUR
9.000,00 EUR	1 SET	1 SET	9.000,00 EUR
211.287,25 EUR			83.910,41 EUR
1.013.000,00 NOK	2.000 KG	480 KG	243.120,00 NOK
1.013.000,00 NOK			243.120,00 NOK
6.390,00 EUR	24 SET	24 SET	6.390,00 EUR
3.000,00 EUR	2 SET	2 SET	3.000,00 EUR
9.390,00 EUR			9.390,00 EUR
55.325,00 EUR	65 PCS	30 PCS	25.775,00 EUR
55.325,00 EUR			25.775,00 EUR
115.200,00 EUR	256 PCS	44 PCS	16.985,00 EUR
15.879,00 EUR	38 PCS	14 PCS	6.061,00 EUR
4.352,60 EUR	220 PCS	214 PCS	4.163,10 EUR
2.589,00 EUR	805 PCS	805 PCS	2.589,00 EUR
1.923.682,48 EUR	11.709.440 PCS	2.543.960 PCS	431.642,42 EUR
76.780,00 USD	180.000 PCS	unused	unused
2.061.703,08 EUR			461.440,52 EUR
76.780,00 USD			0,00 USD

Import from	Number of licences	Description of goods	ML code
Serbia	1	Tools	ML18a
Serbia	7	Ammunition	ML3a
Serbia	1	Airplane	ML10b
Serbia	2	Forging mandrel for gun barrel	ML18a
Serbia	1	Forging mandrel for gun barrel hammer (tools)	ML18a
TOTAL	12		
USA	2	Parts for pistols	ML1d
USA	4	Pistols	ML1a
USA	2	Rifles	ML1a
USA	1	Parts of rifles	ML1a
USA	1	Weapons sights	ML1d
TOTAL	10		
Slovenia	1	Grenade launcher parts	ML2a
Slovenia	6	Tools	ML18a
Slovenia	2	Rifles	ML1a
Slovenia	2	Ammunition	ML3a
Slovenia	3	Parts for pistols	ML1a
TOTAL	14		
Turkey	2	Electrical igniter	ML4a
TOTAL	2		

Authorised value	Authorised quantity	Used quantity	Used value
22.240,00 EUR	16 PCS	unused	unused
253.436,00 EUR	944.000 PCS	558.000 PCS	131.541,50 EUR
70.000,00 USD	1 PCS	unused	unused
7.310,00 EUR	3 PCS	3 PCS	7.310,00 EUR
20.160,00 EUR	16 PCS	16 PCS	20.160,00 EUR
303.146,00 EUR			159.011,50 EUR
70.000,00 USD			0,00 USD
320.000,00 USD	160.000 PCS	15.000 PCS	30.000,00 USD
27.770,28 USD	43 PCS	10 PCS	6.464,94 USD
35.461,60 USD	127 PCS	127 PCS	35.461,60 USD
32.260,00 EUR	60 PCS	unused	unused
1.117,39 USD	42 PCS	42 PCS	1.117,39 USD
160.000,00 USD	80.000 PCS	23.000 PCS	46.000,00 USD
32.260,00 EUR			0,00 EUR
544.349,27 USD			119.043,93 USD
85,00 EUR	120 PCS	unused	unused
351.270,00 EUR	19 PCS	2 PCS	55.050,00 EUR
23.350,00 EUR	56 PCS	32 PCS	11.296,00 EUR
47.000,00 EUR	140.000 PCS	85.000 PCS	12.428,00 EUR
400,00 EUR	600 PCS	301 PCS	190,50 EUR
20.650,00 EUR	1 SET	1 SET	20.650,00 EUR
442.755,00 EUR			99.614,50 EUR
29.400,00 EUR	63.000 PCS	4.749 PCS	9.648,60 EUR
29.400,00 EUR			9.648,60 EUR

Import from	Number of licences	Description of goods	ML code
Great Britain	1	Chemical detector	ML7g
Great Britain	1	Biological identifier	ML7g
TOTAL	2		
Sweden	1	Ammunition	ML3a
TOTAL	1		
Switzerland	1	Ballistic vest	ML13d
Switzerland	1	Parts for pistols	ML1a
TOTAL	2		
TOTAL	179		

Authorised value	Authorised quantity	Used quantity	Used value
31.620,00 EUR	5 PCS	5 PCS	31.620,00 EUR
45.912,00 EUR	2 PCS	2 PCS	45.912,00 EUR
77.532,00 EUR			77.532,00 EUR
56.905,00 EUR	60.000 PCS	34.300 PCS	40.881,90 EUR
56.905,00 EUR			40.881,90 EUR
125,00 EUR	20 m <sup>2</sup>	unused	unused
539,23 EUR	17 PCS	17 PCS	539,23 EUR
664,23 EUR			539,23 EUR
4.693.735,17 EUR			1.544.678,55 EUR
1.045.449,27 USD			222.863,93 USD
1.013.000,00 NOK			243.120,00 NOK

### Appendix 3 | Export of non-military lethal goods in 2010.

Export to	Number of licences	Description of goods
Austria	1	Explosive substances
<b>TOTAL</b>	<b>1</b>	
Bosnia and Herzegovina	6	Explosive substances
Bosnia and Herzegovina	1	Hunting ammunition
Bosnia and Herzegovina	4	Pyrotechnic devices
<b>TOTAL</b>	<b>11</b>	
Bulgaria	3	Explosive substances
<b>TOTAL</b>	<b>3</b>	
Finland	1	Explosive substances
<b>TOTAL</b>	<b>1</b>	
Greece	4	Explosive substances
<b>TOTAL</b>	<b>4</b>	
Italy	2	Hunting ammunition
<b>TOTAL</b>	<b>2</b>	
Macedonia	1	Pyrotechnic devices
<b>TOTAL</b>	<b>1</b>	
Hungary	1	Hunting ammunition
<b>TOTAL</b>	<b>1</b>	
Montenegro	2	Hunting ammunition

Authorised value	Authorised quantity	Used quantity	Used value
871.250,00 EUR	750.000 PCS	16.920 PCS	22.925,89 EUR
871.250,00 EUR			22.925,89 EUR
259.080,00 EUR	92.000 PCS	unused	unused
500.320,00 EUR	750.000 M	unused	unused
150,00 USD	20 PCS	20 PCS	150 USD
85.320,00 EUR	500.000 PCS	201.170 PCS	29.376,37 EUR
24.698,50 USD	7.045 PCS	6.750 PCS	19.246,00 USD
844.720,00 EUR			29.376,37 EUR
24.848,50 USD			19.396,00 USD
195.000,00 EUR	220.000 M	100.000 M	20.500,00 EUR
150.000,00 EUR	300.000 PCS	unused	unused
345.000,00 EUR			20.500,00 EUR
91.000.000,00 EUR	70.000.000 PCS	unused	unused
91.000.000,00 EUR			0,00 EUR
5.000,00 EUR	40.000 M	7.500 M	1.125,00 EUR
1.950.000,00 EUR	1.300.000 PCS	36.460 PCS	49.612,00 EUR
1.955.000,00 EUR			50.737,00 EUR
25.650,00 EUR	3.700.000 PCS	unused	unused
25.650,00 EUR			0,00 EUR
17.504,50 USD	2.937 PCS	297 PCS	1.093,50 USD
17.504,50 USD			1.093,50 USD
4.320,00 EUR	29.000 PCS	29.000 PCS	4.320,00 EUR
4.320,00 EUR			4.320,00 EUR
77.654,50 EUR	383.000 PCS	75.000 PCS	12.920,00 EUR



Export to	Number of licences	Description of goods
Montenegro	1	Explosive substances
TOTAL	3	
Germany	2	Explosive substances
TOTAL	2	
Poland	1	Explosives
TOTAL	1	
Portugal	1	Explosive substances
TOTAL	1	
Romania	2	Explosive substances
TOTAL	2	
Serbia	2	Sporting pistols
Serbia	3	Explosive substances
Serbia	5	Hunting ammunition
Serbia	2	Pyrotechnic devices
Serbia	1	Explosives
TOTAL	13	
Slovakia	1	Explosives
TOTAL	1	
Slovenia	2	Explosive substances
TOTAL	2	

Authorised value	Authorised quantity	Used quantity	Used value
115.000,00 EUR	500.000 M	200.000 M	46.000,00 EUR
192.654,50 EUR			58.920,00 EUR
4.800.000,00 EUR	4.000.000 PCS	834.820 PCS	1.079.401,72 EUR
4.800.000,00 EUR			1.079.401,72 EUR
20.807,47 EUR	15.984 KG	unused	unused
20.807,47 EUR			0,00 EUR
300.000,00 EUR	300.000 PCS	110.000 PCS	172.505,00 EUR
300.000,00 EUR			172.505,00 EUR
71.200,00 EUR	167.700 PCS	27.270 PCS	52.802,30 EUR
71.200,00 EUR			52.802,30 EUR
1.232,00 EUR	2 PCS	2 PCS	1.232,00 EUR
280.140,00 EUR	253.000 PCS	unused	unused
1,30 USD	5 PCS	5 PCS	1,30 USD
1.000.230,00 EUR	3.720.000 PCS	623.500 PCS	108.063,47 EUR
90.751,42 USD	187.608 PCS	187.507 PCS	72.919,92 USD
14.131,46 EUR	15.075 KG	unused	unused
1.295.733,46 EUR			109.295,47 EUR
90.752,72 USD			72.921,22 USD
40,00 EUR	50 KG	50 KG	25,00 EUR
40,00 EUR			25,00 EUR
2.701.420,00 EUR	952.480 PCS	5.900 PCS	21.321,00 EUR
2.701.420,00 EUR			21.321,00 EUR

Export to	Number of licences	Description of goods
Turkey	3	Explosive substances
TOTAL	3	
Switzerland	2	Explosive substances
TOTAL	2	
TOTAL	54	

Authorised value	Authorised quantity	Used quantity	Used value
7.257.000,00 EUR	3.900.000 PCS	120.460 PCS	189.223,75 EUR
7.257.000,00 EUR			189.223,75 EUR
866.900,00 EUR	700.000 PCS	123.500 PCS	166.296,00 EUR
866.900,00 EUR			166.296,00 EUR
112.551.695,43 EUR			1.978.743,00 EUR
133.105,72 USD			92.317,22 USD

## Appendix 4 | Import of non-military lethal goods in 2010.

Import from	Number of licences	Description of goods
Austria	6	Explosives
Austria	12	Hunting rifles
Austria	6	Hunting ammunition
Austria	1	Pyrotechnic devices
<b>TOTAL</b>	<b>25</b>	
Belgium	2	Hunting rifles
Belgium	4	Hunting ammunition
<b>TOTAL</b>	<b>6</b>	
Bosnia and Herzegovina	18	Explosive substances
Bosnia and Herzegovina	1	Hunting ammunition
Bosnia and Herzegovina	4	Explosives
<b>TOTAL</b>	<b>23</b>	
Bulgaria	9	Explosives
Bulgaria	2	Anti-hail rockets
<b>TOTAL</b>	<b>11</b>	
France	1	Pyrotechnic devices
<b>TOTAL</b>	<b>1</b>	
Greece	3	Hunting rifles
Greece	1	Parts of hunting rifles
<b>TOTAL</b>	<b>4</b>	

Authorised value	Authorised quantity	Used quantity	Used value
590.000,00 EUR	500.000 KG	146.194 KG	153.161,41 EUR
378.000,00 EUR	120.000 PCS	9.000 PCS	27.601,00 EUR
82.864,00 EUR	72 PCS	9 PCS	8.198,00 EUR
101.666,96 EUR	963.385 PCS	227.585 PCS	37.841,41 EUR
1.226,10 EUR	310 PCS	269 PCS	936,60 EUR
1.153.757,06 EUR			227.738,42 EUR
15.850,00 EUR	21 PCS	unused	unused
42.000,00 EUR	200.000 PCS	unused	unused
104.000,00 USD	28.000.000 PCS	262.046 PCS	17.163,89 USD
57.850,00 EUR			0,00 EUR
104.000,00 USD			17.163,89 USD
926.558,00 EUR	1.079.000 PCS	49.000 PCS	40.415,00 EUR
8.430,00 EUR	200.000 PCS	unused	unused
1.312.000,00 EUR	2.200.000 KG	204.000 KG	123.660,00 EUR
2.246.988,00 EUR			164.075,00 EUR
5.417.500,00 EUR	5.500.000 KG	255.000 KG	232.850,00 EUR
173.000,00 EUR	70.000 PCS	unused	unused
429.550,00 EUR	2.070 PCS	1.000 PCS	211.000,00 EUR
6.020.050,00 EUR			443.850,00 EUR
2.606,00 EUR	200 PCS	200 PCS	2.606,00 EUR
2.606,00 EUR			2.606,00 EUR
9.351,00 EUR	16 PCS	10 PCS	5.024,00 EUR
152,00 EUR	2 PCS	unused	unused
9.503,00 EUR			5.024,00 EUR

Import from	Number of licences	Description of goods
Hong Kong	1	Pyrotechnic devices
<b>TOTAL</b>	<b>1</b>	
Italy	13	Hunting ammunition
Italy	15	Pyrotechnic devices
Italy	5	Sporting pistols
Italy	2	Gunpowder
Italy	5	Parts of hunting rifles
Italy	15	Hunting rifles
Italy	8	Vessel line throwing device
Italy	3	Explosive substances
Italy	2	Explosives
<b>TOTAL</b>	<b>68</b>	
Japan	2	Hunting rifles
<b>TOTAL</b>	<b>2</b>	
China	4	Pyrotechnic devices
<b>TOTAL</b>	<b>4</b>	
Macedonia	1	Anti-hail rockets
<b>TOTAL</b>	<b>1</b>	
Hungary	1	Explosives
<b>TOTAL</b>	<b>1</b>	
Montenegro	2	Explosives
Montenegro	2	Anti-hail rockets
<b>TOTAL</b>	<b>4</b>	

Authorised value	Authorised quantity	Used quantity	Used value
14.632,95 USD	4.169 PCS	4.169 PCS	14.632,95 USD
14.632,95 USD			14.632,95 USD
1.475.000,00 EUR	550.000 KG	28.000 KG	56.290,00 EUR
1.199.846,51 EUR	18.972.400 PCS	3.111.050 PCS	194.194,08 EUR
173.852,62 EUR	40.780 PCS	40.633 PCS	169.497,61 EUR
7.052,00 EUR	6 PCS	4 PCS	6.386,00 EUR
189.000,00 EUR	12.000 KG	1.800 KG	20.840,00 EUR
3.732,60 EUR	50 PCS	37 PCS	3.038,10 EUR
150.306,50 EUR	254 PCS	74 PCS	39.821,85 EUR
14.748,78 EUR	76 PCS	76 PCS	14.748,78 EUR
2.910,00 USD	97,0 M	30,5 M	915,00 USD
5.650,00 USD	25 PCS	25 PCS	5.650,00 USD
45.470,00 USD	1.111 PCS	1.111 PCS	45.470,00 USD
3.213.539,01 EUR			504.816,42 EUR
54.030,00 USD			52.035,00 USD
44.996,00 EUR	40 PCS	15 PCS	18.248,00 EUR
44.996,00 EUR			18.248,00 EUR
20.175,52 USD	11.844 PCS	8.764 PCS	19.470,16 USD
20.175,52 USD			19.470,16 USD
400 EUR	40 PCS	40 PCS	400 EUR
400 EUR			400 EUR
1.390.000,00 EUR	1.500.000 KG	unused	unused
1.390.000,00 EUR			0,00 EUR
560.000,00 EUR	700.000 KG	114.412 KG	91.529,60 EUR
805.740,00 EUR	3.788 PCS	1.030 PCS	226.600,00 EUR
1.365.740,00 EUR			318.129,60 EUR



Import from	Number of licences	Description of goods
Germany	9	Hunting rifles
Germany	2	Parts of hunting rifles
Germany	2	Sporting pistols
Germany	2	Hunting ammunition
Germany	4	Pyrotechnic devices
TOTAL	19	
Norway	1	Explosives
TOTAL	1	
Poland	4	Explosives
TOTAL	4	
Portugal	1	Hunting rifles
TOTAL	1	
Czech Republic	16	Explosives
Czech Republic	14	Explosive substances
Czech Republic	4	Hunting rifles
Czech Republic	3	Parts for Sporting pistols
Czech Republic	2	Parts of hunting rifles
Czech Republic	7	Hunting ammunition
Czech Republic	1	Gunpowder
TOTAL	47	
Romania	2	Explosives
TOTAL	2	

Authorised value	Authorised quantity	Used quantity	Used value
94.789,65 EUR	184 PCS	74 PCS	31.106,24 EUR
660,40 EUR	30 PCS	unused	unused
3.622,00 EUR	18 PCS	unused	unused
30.307,58 EUR	571.300 PCS	570.000 PCS	27.922,00 EUR
8.817,48 EUR	2.169 PCS	2.011 PCS	4.844,56 EUR
138.197,11 EUR			63.872,80 EUR
253.250,00 NOK	500 KG	500 KG	253.250,00 NOK
253.250,00 NOK			253.250,00 NOK
1.100.400,00 EUR	1.400.000 KG	47.960 KG	62.932,68 EUR
1.100.400,00 EUR			62.932,68 EUR
6.800,00 EUR	11 PCS	11 PCS	6.800,00 EUR
6.800,00 EUR			6.800,00 EUR
17.343.000,00 EUR	14.230.000 KG	214.478 KG	248.449,10 EUR
1.302.430,00 EUR	3.009.000 PCS	142.952 PCS	217.519,66 EUR
110.000,00 EUR	300.000 KG	unused	unused
2.948.500,00 EUR	10.470.000 M	342.000 M	74.450,00 EUR
90.800,00 EUR	252 PCS	50 PCS	12.591,12 EUR
1.661,00 EUR	59 PCS	55 PCS	849,00 EUR
1.530,10 EUR	134 PCS	132 PCS	1.392,60 EUR
47.700,90 EUR	614.450 PCS	201.200 PCS	11.276,65 EUR
30.000,00 EUR	5.000 KG	912 KG	5.472,00 EUR
21.875.622,00 EUR			572.000,13 EUR
1.465.200,00 EUR	1.200.000 KG	15.984 KG	14.886,95 EUR
1.465.200,00 EUR			14.886,95 EUR

Import from	Number of licences	Description of goods
Serbia	2	Explosives
Serbia	3	Hunting ammunition
Serbia	1	Gunpowder
<b>TOTAL</b>	<b>6</b>	
USA	1	Sporting pistols
USA	4	Explosive substances
USA	1	Explosives
USA	1	Sporting pistols
USA	1	Hunting rifles
<b>TOTAL</b>	<b>8</b>	
Slovenia	5	Explosives
Slovenia	3	Gunpowder
Slovenia	1	Hunting ammunition
Slovenia	2	Pyrotechnic devices
Slovenia	1	Explosive substances
Slovenia	1	Hunting rifles
<b>TOTAL</b>	<b>13</b>	
<b>TOTAL</b>	<b>252</b>	

Authorised value	Authorised quantity	Used quantity	Used value
777.500,00 EUR	1.000.000 KG	125.733 KG	121.896,40 EUR
11.250,00 EUR	2.500.000 PCS	350.000 PCS	2.450,00 EUR
535.000,00 EUR	250.000 KG	12.000 KG	21.600,00 EUR
13.780,00 EUR	1.300 KG	1.093 KG	11.585,80 EUR
1.337.530,00 EUR			157.532,20 EUR
1.687,05 USD	5 PCS	unused	unused
17.650,00 USD	1.615 PCS	1.615 PCS	17.650,00 USD
6.187,50 USD	750 PCS	750 PCS	6.187,50 USD
15.277,40 USD	304 M	304 M	15.277,40 USD
953,40 USD	2 PCS	2 PCS	953,40 USD
1.282,45 USD	10 PCS	10 PCS	1.282,45 USD
43.037,80 USD			41.350,75 USD
950.100,00 EUR	875.000 KG	73.228 KG	76.296,86 EUR
84.657,50 EUR	5.280 KG	1.970 KG	22.420,00 EUR
76.000,00 EUR	500.000 PCS	15.000 PCS	2.575,00 EUR
75.000,00 EUR	13.000 KG	5.904,62 KG	29.706,05 EUR
53.000,00 EUR	50.000 PCS	unused	unused
2.100,00 EUR	1 PCS	1 PCS	2.100,00 EUR
1.240.857,50 EUR			133.097,91 EUR
42.670.035,68 EUR			2.191.193,69 EUR
235.876,27 USD			144.652,75 USD
253.250,00 NOK			253.250,00 NOK

## Appendix 5 | Temporary export of military goods in 2010.

Export to	Number of licences	Description of goods	ML code
Belgium	1	Parts of rifles	ML1d
Belgium	1	Pistols	ML1a
<b>TOTAL</b>	<b>2</b>		
France	1	Helmets	ML13c
France	1	Telescope sights	ML2c
France	1	Testing equipment	ML5d
France	1	Bullet model	ML3a
France	1	Grenade launcher	ML2a
France	1	Rifles	ML1a
France	1	Pistols	ML1a
<b>TOTAL</b>	<b>7</b>		
India	1	Machine gun	ML1a
<b>TOTAL</b>	<b>1</b>		
Hungary	1	Parts of rifles	ML1d
Hungary	1	Rifles	ML1a
Hungary	1	Grenade launcher	ML2a
Hungary	1	Pistols	ML1a
<b>TOTAL</b>	<b>4</b>		
Montenegro	1	Rifles	ML1a
Montenegro	1	Pistols	ML1a
Montenegro	1	Grenade launcher	ML2a
Montenegro	1	Parts of rifles	ML1d
<b>TOTAL</b>	<b>4</b>		

Value	Quantity	Clarification
250,00 EUR	1 PCS	For repair
500,66 USD	1 PCS	For repair
250,00 EUR		
500,66 USD		
1.080,00 EUR	18 PCS	For presentation
11.400,00 EUR	3 PCS	For presentation
1.100,00 EUR	1 PCS	For presentation
40,00 EUR	8 PCS	For presentation
5.000,00 EUR	2 PCS	For presentation
3.300,00 EUR	3 PCS	For presentation
3.900,00 EUR	13 PCS	For presentation
25.820,00 EUR		
4.500,00 USD	2 PCS	Testing
4.500,00 USD		
1.744,00 EUR	11 PCS	For presentation
3.600,00 EUR	3 SET*	For presentation
1.000,00 EUR	1 SET	For presentation
1.545,00 EUR	6 SET	For presentation
7.889,00 EUR		
3.600,00 EUR	3 SET	For presentation
1.545,00 EUR	6 SET	For presentation
1.000,00 EUR	1 SET	For presentation
1.744,00 EUR	11 PCS	For presentation
7.889,00 EUR		

Export to	Number of licences	Description of goods	ML code
Germany	1	Laser module	ML1d
<b>TOTAL</b>	<b>1</b>		
Poland	1	Rifles	ML1a
Poland	1	Pistols	ML1a
<b>TOTAL</b>	<b>2</b>		
Czech Republic	1	Machines for AOP	ML11g
Czech Republic	1	Optical media	ML21b4
Czech Republic	1	Grenade launcher	ML2a
Czech Republic	1	Rifles	ML1a
Czech Republic	1	Helmets	ML13c
Czech Republic	1	Ammunition	ML3a
Czech Republic	1	Pistols	ML1a
<b>TOTAL</b>	<b>7</b>		
Slovenia	2	Assault rifle tools	ML18a
<b>TOTAL</b>	<b>2</b>		
Switzerland	1	Parts for pistols	ML1a
<b>TOTAL</b>	<b>1</b>		
UAE	1	Grenade launcher	ML2a
UAE	1	Pistols	ML1a
UAE	2	Rifles	ML1a
UAE	1	Ammunition	ML3a
UAE	1	Testing equipment	ML5d
UAE	1	Weapon sights	ML2c
<b>TOTAL</b>	<b>7</b>		
<b>TOTAL</b>	<b>38</b>		

Value	Quantity	Clarification
830,70 EUR	1 SET	For repair
830,70 EUR		
3.000,00 EUR	2 SET	For presentation
6.390,00 EUR	24 SET	For presentation
9.390,00 EUR		
3.000,00 EUR	2 PCS	For presentation
10,00 EUR	1 PCS	For presentation
3.500,00 EUR	1 PCS	For presentation
2.800,00 EUR	2 PCS	For presentation
1.280,00 EUR	8 PCS	For presentation
40,00 EUR	8 PCS	For presentation
1.800,00 EUR	6 PCS	For presentation
12.430,00 EUR		
64.000,00 EUR	4 SET	Modification
64.000,00 EUR		
539,23 EUR	17 PCS	Modification
539,23 EUR		
7.000,00 USD	2 PCS	For presentation
5.200,00 USD	13 PCS	For presentation
16.500,00 USD	4 PCS	For presentation
60,00 USD	8 PCS	For presentation
1.500,00 USD	1 PCS	For presentation
15.300,00 USD	3 PCS	For presentation
45.560,00 USD		
129.037,93 EUR		
50.560,66 USD		



**Appendix 6 | Temporary import of military goods in 2010.**

Import from	Number of licences	Description of goods	ML code
Libya	2	Warship	ML9a
<b>TOTAL</b>	<b>2</b>		
Norway	5	Military telephones	ML11a
<b>TOTAL</b>	<b>5</b>		
<b>TOTAL</b>	<b>7</b>		

**Appendix 7 | Provision of services for military goods in 2010.**

Countries	Number of licences	Description of goods	ML code
Bosnia / Austria	1	Parts of rifles	ML1d
Bosnia / Austria	4	Rifles	ML1a
Bosnia / USA	5	Ammunition	ML3a
<b>TOTAL</b>	<b>10</b>		

Value	Quantity	Clarification
3.000.000,00 USD	2 PCS	Repair
3.000.000,00 USD		
30.280,00 NOK	58 PCS	For repair
30.280,00 NOK		
3.000.000,00 USD		
30.280,00 NOK		

Value	Quantity
17.000,00 USD	3.400 PCS
406.204,00 USD	4.767 PCS
11.325.000,00 USD	203.900 PCS
11.748.204,00 USD	

## Appendix 8 | Export of military goods (Licences issued in 2009 and used in 2010)

Export to	Number of licences	Description of goods	ML code
Bosnia and Herzegovina	1	Pistols	ML1a
TOTAL	1		
Montenegro	1	Helmets	ML13c
TOTAL	1		
Greece	1	Pistols	ML1a
TOTAL	1		
Peru	1	Helmets	ML13c
TOTAL	1		
USA	5	Pistols	ML1a
USA	1	Pistols	ML1a
TOTAL	6		
Germany	1	Helmets	ML13c
TOTAL	1		
TOTAL	11		

Authorised value	Authorised quantity	Used quantity	Used value
141.500,00 EUR	530 SET	380 PCS	89.280,00 EUR
141.500,00 EUR			89.280,00 EUR
261.800,00 EUR	2.000 PCS	2.000 PCS	261.800,00 EUR
261.800,00 EUR			261.800,00 EUR
48.200,00 EUR	170 SET	170 SET	48.200,00 EUR
48.200,00 EUR			48.200,00 EUR
65.985,00 EUR	415 PCS	415 PCS	65.985,00 EUR
65.985,00 EUR			65.985,00 EUR
92.635.000,00 USD	495.000 SET	58.220 SET	11.516.675,00 USD
555,00 USD	1 PCS	1 PCS	48,00 USD
92.635.555,00 USD			11.516.723,00 USD
2.310,00 EUR	22 PCS	9 PCS	1.070,00 EUR
2.310,00 EUR			1.070,00 EUR
519.795,00 EUR			466.335,00 EUR
92.635.555,00 USD			11.516.723,00 USD

## Appendix 9 | Import of military goods (licences issued in 2009 and used in 2010)

Import from	Number of licences	Description of goods	ML code
Austria	1	Forging mandrel for gun barrel	ML18a
Austria	3	Rifles	ML1a
Austria	2	Ammunition	ML3a
Austria	1	Tools	ML18a
Austria	1	Parts of rifles	ML1a
<b>TOTAL</b>	<b>8</b>		
Belgium	1	Rifles	ML1a
Belgium	1	Parts of rifles	ML1d
<b>TOTAL</b>	<b>2</b>		
Czech Republic	2	Ammunition	ML3a
Czech Republic	1	Parts for pistols	ML1d
<b>TOTAL</b>	<b>3</b>		
Germany	1	Tools	ML18a
<b>TOTAL</b>	<b>1</b>		
USA	1	Rifles	ML1a
USA	1	Hunting rifles	ML1a
<b>TOTAL</b>	<b>2</b>		
Slovenia	1	Tools	ML18a
Slovenia	1	Parts for pistols	ML1a
Slovenia	1	Ammunition	ML3a
<b>TOTAL</b>	<b>3</b>		
Serbia	1	Ammunition	ML3a
<b>TOTAL</b>	<b>1</b>		

Authorised value	Authorised quantity	Used quantity	Used value
6.974,00 EUR	5 PCS	5 PCS	6.974,00 EUR
103.173,88 EUR	77 PCS	10 PCS	12.676,60 EUR
144.841,92 EUR	492.800 PCS	97.200 PCS	36.499,60 EUR
5.876,00 EUR	2 PCS	2 PCS	5.876,00 EUR
18.146,40 EUR	38 PCS	4 PCS	1.755,60 EUR
279.012,20 EUR			63.781,80 EUR
4.580,00 EUR	6 PCS	6 PCS	4.580,00 EUR
1.831,15 EUR	85 PCS	85 PCS	1.482,17 EUR
6.411,15 EUR			6.062,17 EUR
98.297,30 EUR	701.300 PCS	240.600 PCS	42.354,80 EUR
280,00 EUR	20 PCS	20 PCS	280,00 EUR
98.577,30 EUR			42.634,80 EUR
21.320,00 EUR	14 PCS	14 PCS	21.320,00 EUR
21.320,00 EUR			21.320,00 EUR
16.600,00 EUR	40 PCS	40 PCS	16.600,00 EUR
13.975,00 EUR	25 PCS	25 PCS	13.975,00 EUR
30.575,00 EUR			30.575,00 EUR
40.000,00 EUR	1 PCS	1 PCS	40.000,00 EUR
150,00 EUR	100 PCS	52 PCS	78,00 EUR
45.000,00 EUR	290.000 PCS	148.500 PCS	23.149,60 EUR
85.150,00 EUR			63.227,60 EUR
21.700,00 EUR	100.000 PCS	100.000 PCS	21.700,00 EUR
21.700,00 EUR			21.700,00 EUR

Import from	Number of licences	Description of goods	ML code
Sweden	1	Ammunition	ML3a
TOTAL	1		
TOTAL	21		

Authorised value	Authorised quantity	Used quantity	Used value
59.905,00 EUR	60.000 PCS	19.300 PCS	600 EUR
59.905,00 EUR			600 EUR
602.650,65 EUR			249.901,37 EUR



### Appendix 10 | Export of non-military lethal goods (licences issued in 2009 and used in 2010)

Export to	Number of licences	Description of goods
Austria	2	Explosive substances
TOTAL	2	
Greece	1	Explosive substances
TOTAL	1	
Hungary	1	Explosive substances
TOTAL	1	
Germany	1	Explosive substances
TOTAL	1	
TOTAL	5	

Authorised value	Authorised quantity	Used quantity	Used value
928.667,55 EUR	771.643 PCS	31.430 PCS	42.337,51 EUR
928.667,55 EUR			42.337,51 EUR
487.500,00 EUR	325.000 PCS	137.740 PCS	189.350,92 EUR
487.500,00 EUR			189.350,92 EUR
32.600,00 EUR	300 PCS	290 PCS	5.924,00 EUR
32.600,00 EUR			5.924,00 EUR
2.400.000,00 EUR	2.000.000 PCS	119.910 PCS	139.341,70 EUR
2.400.000,00 EUR			139.341,70 EUR
3.848.767,55 EUR			376.954,13 EUR

## Appendix 11 | Import of non-military lethal goods (licences issued in 2009 and used in 2010)

Import from	Number of licences	Description of goods
Austria	1	Explosives
Austria	1	Explosives
Austria	2	Hunting ammunition
Austria	3	Hunting rifles
<b>TOTAL</b>	<b>7</b>	
Belgium	2	Hunting rifles
Belgium	1	Parts of hunting rifles
<b>TOTAL</b>	<b>3</b>	
Bosnia and Herzegovina	2	Explosives
<b>TOTAL</b>	<b>2</b>	
Bulgaria	1	Explosives
<b>TOTAL</b>	<b>1</b>	
Montenegro	1	Explosives
<b>TOTAL</b>	<b>1</b>	
Czech Republic	2	Explosive substances
Czech Republic	1	Hunting ammunition
Czech Republic	2	Explosives
Czech Republic	2	Explosive substances
<b>TOTAL</b>	<b>7</b>	
Italy	1	Hunting ammunition
Italy	2	Sporting pistols
Italy	1	Explosives
Italy	1	Explosive substances

Authorised value	Authorised quantity	Used quantity	Used value
126.000,00 EUR	40.000 PCS	7 PCS	21.614,00 EUR
191.000,00 EUR	150.000 KG	48.000 KG	49.386,20 EUR
27.175,74 EUR	128.800 PCS	63.400 PCS	7.459,23 EUR
36.668,86 EUR	34 PCS	6 PCS	7.337,00 EUR
380.844,60 EUR			85.796,43 EUR
108.188,00 EUR	166 PCS	28 PCS	20.612,00 EUR
447,50 EUR	45 PCS	45 PCS	447,50 EUR
108.635,50 EUR			21.059,50 EUR
656.000,00 EUR	1.100.000 KG	81.000 KG	43.440,00 EUR
656.000,00 EUR			43.440,00 EUR
625.000,00 EUR	500.000 KG	88.000 KG	92.400,00 EUR
625.000,00 EUR			92.400,00 EUR
274.000,00 EUR	350.000 KG	28.604 KG	21.739,04 EUR
274.000,00 EUR			21.739,04 EUR
650.000,00 EUR	1.500.000 PCS	24.475 PCS	39.405,95 EUR
6.944,00 EUR	169.500 PCS	19.500 PCS	1.794,00 EUR
2.191.600,00 EUR	1.984.000 KG	213.488 KG	243.306,00 EUR
668.000,00 EUR	2.400.000 M	105.040 M	25.792,00 EUR
3.516.544,00 EUR			310.297,95 EUR
142.060,00 EUR	1.000.000 PCS	1.000.000 PCS	134.100,10 EUR
9.259,42 EUR	45 PCS	45 PCS	9.259,42 EUR
35.050,00 USD	3.505 PCS	3.505 PCS	35.050,00 USD
5.900,00 USD	38 PCS	38 PCS	5.900,00 USD

Import from	Number of licences	Description of goods
Italy	1	Explosive substances
TOTAL	6	
Hungary	1	Explosives
TOTAL	1	
Romania	1	Explosives
TOTAL	1	
Slovenia	1	Explosives
TOTAL	1	
Serbia	1	Explosives
TOTAL	1	
Spain	1	Explosive substances
TOTAL	1	
TOTAL	32	

Authorised value	Authorised quantity	Used quantity	Used value
2.889,00 USD	96 M	96 M	2.880,00 USD
151.319,42 EUR			143.359,52 EUR
43.839,00 USD			43.830,00 USD
935.000,00 EUR	1.000.000 KG	31.968 KG	28.451,52 EUR
935.000,00 EUR			28.451,52 EUR
792.000,00 EUR	600.000 KG	31.984 KG	36.846,14 EUR
792.000,00 EUR			36.846,14 EUR
1.390.500,00 EUR	1.350.000 KG	6.736 KG	6.519,20 EUR
1.390.500,00 EUR			6.519,20 EUR
390.000,00 EUR	500.000 KG	122.960 KG	114.735,40 EUR
390.000,00 EUR			114.735,40 EUR
840.000,00 EUR	2.000.000 KG	705.600 KG	300.666,39 EUR
840.000,00 EUR			300.666,39 EUR
10.059.843,52 EUR			1.205.311,09 EUR
43.839,00 USD			43.830,00 USD

## Appendix 12 | List of companies registered in the Register of Importers and Exporters of Military and Non-Military Lethal Goods

#	Company name	Address
1.	„BRODOMERKUR TRGOVINA I USLUGE“ d.d.	Split, Poljička cesta 35
2.	„ŠESTAN-BUSCH“ d.o.o.	Prelog, Industrijska zona 3
3.	„RUDAR - POSEBNA TRGOVINA“ d.o.o.	Zagreb, Smičiklasova 23
4.	„MAJOR I PARTNERI“ d.o.o.	Zagreb, Roberta Frangeša Mihanovića 5
5.	„EKSPLO-PROMET“ d.o.o.	Velika Gorica, Jurjevski Hrast 3
6.	„AGENCIJA ALAN“ d.o.o.	Zagreb, Grškovićeve 15
7.	„Explosives“ d.o.o.	Labin, Rudarska 1
8.	„SPORTCOMMERCE“ d.o.o.	Zagreb, Livadićeve 22
9.	„ATTOS“ d.o.o.	Varaždin, Kukuljevićeve 14
10.	„HS PRODUKT“ d.o.o.	Karlovac, M. Bogovića 7
11.	„CROEX-TRADE“ d.o.o.	Split, Supavla 39
12.	„HUT“ d.o.o.	Poreč, 43. Istarske divizije 40
13.	„LOVAC TRGOVINA“ d.o.o.	Zagreb, Varšavska 4
14.	„MIRNOVEC PIROTEHNIKA“ d.o.o.	Samobor, Mirnovec 20
15.	„MAXAM DETINES“ d.o.o.	Lijeva Martinska Ves, Mahovo bb
16.	„DETONEX“ d.o.o.	Zagreb, J. Martinovića 11
17.	„ĐURO ĐAKOVIĆ“ - Specijalna vozila d.d.	Slavonski Šip, Dr. Mile Budaka 1
18.	„ATIR“ d.o.o.	Zagreb, Sutinska vrela bb
19.	„BENTHOS“ d.o.o.	Zagreb, Žitnjak bb
20.	„RUMITAL“ d.o.o.	Zagreb, Črnomerec 31a
21.	„FANZOJ-INOX“ d.o.o.	Zagreb, Ogrizovićeve 40
22.	„M.D.M. HUNTER“ d.o.o.	Čavle, Cernik 25a
23.	„AUTOCENTAR-MERKUR“ d.d.	Zagreb, Martićeva 14
24.	„SCOUT“ d.o.o.	Zagreb, Bukovac 77
25.	„MIKRON“ d.o.o.	Marija Bistrica, Hum Bistrički 142a
26.	„TORNADO“ d.o.o.	Lepoglava, Kamenički Vrhovec 38
27.	„MA-RA“ d.o.o.	Zagreb, Širolina 6
28.	„RITOŠA TRGOVINE“ d.o.o.	Poreč, M. Županića 6
29.	„INTER-PROMET“ d.o.o.	Zagreb, Kruge 48
30.	„M-90“ d.o.o.	Duga Resa, Bana Josipa Jelačića 51

#	Company name	Address
31.	„DALMATINER“ d.o.o.	Split, Svetog Petra Starog 33
32.	„KLOŠTAR 900“ d.o.o.	Kloštar Ivanić, Šćapovec 52
33.	„AGROTEHNIKA ŽMINJ“ d.o.o.	Žminj, Pazinska cesta bb
34.	„CROSCO“ Naftni servisi, d.o.o.	Zagreb, Ulica grada Vukovara 18
35.	„MONI TRGOVINA“ d.o.o.	Samobor, Molvice, Molvička 67
36.	„MONI“ d.o.o.	Zagreb, Ilica 132
37.	„KONIS SPORT“ d.o.o.	Pločice, Karasovići 7
38.	„LISKA“ d.o.o.	Zadar, F. G. Fishte 8
39.	„INDUCHEM“ d.o.o.	Zagreb, Vrbanićeva 33
40.	„EUROZON“ d.o.o.	Vrbovec, Luka 345
41.	„ĐURO ĐAKOVIĆ“-Alatnica d.d.	Slavonski Šip, Dr. Mile Budaka 1
42.	„ALDEA“ d.o.o.	Koprivnica, Koprivnička 48, Bakovčice
43.	„MAXAM HRVATSKA“ d.o.o.	Martinska Ves, Mahovo bb
44.	„KROKO-INTERNATIONAL“ d.o.o.	Zagreb, Kancelak 20
45.	„A.M.E.C.“ d.o.o.	Rijeka, Osječka 47
46.	„ADRIA-MAR BRODOGRADNJA“ d.o.o.	Zagreb, Petrovaradinska 1
47.	Obrt „TLORISS“ vl. Marijan Vurnek	Bedekovčina, Naselje Grbovec 46
48.	„HUNTER & KŽ“ d.o.o.	Zagreb, Tomašićeva 4
49.	„LALIZAS MARINA“ d.o.o.	Split, Kopilica 62
50.	„GRAMEH“ d.o.o.	Varaždin, Mirka Maleza 15
51.	„SUIS“ NOVI SPECIJALNI UREĐAJI I SUSTAVI d.o.o.	Zagreb, Potok 41
52.	„REPUTARE“ d.o.o.	Osijek, Divaltova 183
53.	„PROTEKTA“ d.o.o.	Varaždin, Julia Merlića 7
54.	„ERICSSON - N. TESLA“ d.d.	Zagreb, Krapinska 45
55.	„AM TRADE“ d.o.o.	Čavle-Rijeka, Mavrinci 111/D
56.	„ANTIPIROS“ d.o.o.	Split, Pujanke 77A
57.	„DOMJANKOVIĆ“ d.o.o.	V. Gorica, Donji Dragonožec, Turopoljski Markuševec 8
58.	„PLANET PIROTEHNIKA“ d.o.o.	Samobor, Črečni 8
59.	„POMORSKI CENTAR ZA ELEKTRONIKU“ d.o.o.	Split, Zrinsko Frankopanska bb
60.	„AUTOBUSNI KOLODVOR“ d.d.	Karlovac, Prilaz Vječeslava Holjevca 2
61.	„TGL STIMULACIJSKI SERVISI“ d.o.o.	Zagreb, Sortina 1b
62.	„DIBA NEKRETNINE“ d.o.o.	Lički Osik, Čukovac bb



#	Company name	Address
63.	„BAM-ING“ d.o.o.	Zagreb, Belomanastirska 9
64.	„VIRIBUS“ d.o.o.	Zagreb, Ilica 106
65.	„METALLIC“ d.o.o.	Rijeka, Kačjak 4
66.	„RUDEKS PROMET“ d.o.o.	V. Gorica, Jurjevski hrast 3
67.	„ASERVO“ d.o.o.	Split, Gundulićeva 23
68.	„LUVETI“ d.o.o.	Zagreb, Lavoslava Ružičke 48
69.	„MAJOR SUSTAVI“ d.o.o.	Zagreb, R. F. Mihanovića 5
70.	„LAPIS PLUS“ d.o.o.	Zagreb, Ksaver 4
71.	„PYRO-TECH“ d.o.o.	Matulji, Bregi 40/B
72.	„PRO-LINE“ d.o.o.	Rijeka, Srdoči 59
73.	„DOMAR JADRAN“ d.o.o.	Viškovo, T.P.C. Marinići bb
74.	„BOROVO-GUMITRADE“ d.o.o.	Vukovar, Dr. Ante Starčevića 2
75.	„ALTOCOMM“ d.o.o.	Zagreb, Hreljička 12
76.	„ZPZ“ Zagrebački prometni zavod d.o.o.	Zagreb, Ljubljanska avenija 1
77.	„ELINFO MM“ d.o.o.	Zagreb, 4. Maksimirsko naselje 32
78.	„CROEX“ d.o.o.	Split, Put Supavla 39/10

### Appendix 13 | List of companies registered in the Register of Service Providers in the Republic of Croatia

#	Company name	Address
1.	„AGENCIJA ALAN“ d.o.o.	Zagreb, Grškovićeve 15
2.	„RUDAR - POSEBNA TRGOVINA“ d.o.o.	Zagreb, Smičiklasova 23
3.	„DETONEX“ d.o.o.	Zagreb, J. Martinovića 11
4.	„SCOUT“ d.o.o.	Zagreb, Bukovac 77
5.	„MA-RA“ d.o.o.	Zagreb, Širolina 6
6.	„HUNTER & KŽ“ d.o.o.	Zagreb, Tomašićeva 4
7.	„MAJOR I PARTNERI“ d.o.o.	Zagreb, Roberta Frangeša Mihanovića 5
8.	„AUTOCENTAR-MERKUR“ d.d.	Zagreb, Martićeva 14
9.	„ACM - POTHVATI“ d.o.o.	Zagreb, Martićeva 14
10.	„ERICSSON - NIKOLA TESLA“ d.o.o.	Zagreb, Krapinska 45
11.	„MAJOR SUSTAVI“ d.o.o.	Zagreb, Roberta Frangeša Mihanovića 5

## Appendix 14 | Law on the Export and Import of Military and Non-Military Lethal Goods (published in the Official Gazette no. 86 of July 18, 2008)

### GENERAL PROVISIONS

#### Article 1

This Law specifies the conditions for export and import of military goods and non-military lethal goods for commercial purposes; powers for the issuance of licences for export and import of military goods and non-military lethal goods within the competences of the Ministry of Defence and the Ministry of Interior; provision of services pertaining to military goods; competences of state administration bodies in the implementation of this Law; rights and obligations of exporters, importers and service providers; conditions for the pursuit of activities prescribed by this Law; and control and administrative measures.

#### Article 2

The individual terms used in the sense of this Law shall mean the following:

- Military goods (hereinafter: goods) shall mean the goods that are mainly, but not solely constructed, created, assembled or modified for military purpose, including the technology and software connected to these goods, and that are listed in the List of Military Goods [Military List];
- Non-military lethal goods (hereinafter: goods) shall mean the goods listed in the List of Non-Military Lethal Goods for Commercial Purposes;
- Export shall mean the customs procedure regulated by customs regulations, applied for the goods which are permanently or temporarily leaving the customs territory of the Republic of Croatia, including the reexport of such goods. Export shall also mean the transfer of computer programs and technology via electronic media, fax or telephone to the area outside of the Republic of Croatia, and it shall also pertain to the oral transfer of technology by telephone only if the technology is contained in the document the important part of which is read over the telephone, or described over the telephone, in order to achieve the same result;
- Exporter shall mean a legal entity, or a natural person – craftsman, with headquarters in the territory of the Republic of Croatia, registered for the pursuit of activity of trading in goods, and registered in the Register of Exporters and Importers;
- Import shall mean the implementation of customs procedure for goods that are permanently or temporarily entering the customs territory of the Republic of Croatia, including reimport;
- Importer shall mean a legal entity, or a natural person – craftsman, with headquarters in the territory of the Republic of Croatia, registered for the pursuit of activity of trading in goods, and registered in the Register of Exporters and Importers;
- Licence shall mean a special act issued by the competent body on the basis of a written request, in accordance with the provisions of this Law;
- Services shall mean the acquisition of gain, the transfer of rights, and other business activities pertaining to military goods, including brokering services and technical assistance;
- Brokering services shall mean the negotiation or contracting of business in connection with the purchase, sale or procurement of military goods specified in the List from Article 3 of this Law from one foreign country into any other foreign country; sale and purchase of military goods specified in the List from Article 3 of this Law that are located in one foreign country for transfer into another foreign country. Auxiliary services shall not be considered brokering services. Auxiliary services are transportation, financial services, insurance and reinsurance, and advertising or promotion;
- Broker shall mean a legal entity, or a natural person – craftsman, with headquarters in the territory of the Republic of Croatia, engaged in brokering services;
- Technical assistance shall mean any technical assistance in regard to repair, development, production, assembly, testing or maintenance of military goods, and any other technical assistance pertaining to military goods, which may have the form of instruction, training, transfer of business knowledge, or transfer of expert or advisory services. Technical assistance includes oral forms of assistance, written or voice instruction, training, transfers of business knowledge or skills, and consultancy services.

### Article 3

On the basis of the proposal of the competent ministry for the economy (hereinafter: the Ministry), the Government of the Republic of Croatia (hereinafter: the Government) shall reach, through its Regulation, the List of Military Goods harmonised with the Common Military List of the European Union.

### Article 4

On the basis of the proposal of the Ministry, the Government shall reach, through its Regulation, the List of Non-Military Lethal Goods for Commercial Purposes.

### Article 5

The procedures of the issuance of licences for the export and import of goods and for the provision of services, on the basis of this Law, shall be governed by the law specifying the general administrative procedure, unless this Law prescribes otherwise.

## COMPETENCE FOR PROCEDURE PER REQUEST

### Article 6

The export and import of goods and the provision of services, stipulated in Article 2 of this Law, shall be conducted on the basis of licences.

The licences for the export and import of goods and for the provision of services are issued by the Ministry on the basis of consent of the Commission for the Provision of Consent for Export and Import of Military Goods and Non-Military Lethal Goods and for the Provision of Services for Military Goods (hereinafter: the Commission). The Commission consists of the representatives of the ministries competent for defence, internal affairs, foreign affairs, and the economy.

The consent from paragraph 2 of this Article is provided on the basis of the consensus of all the members of the Commission. If any member of the Commission is prevented from participating, the right to vote shall belong to the deputy of that member.

In the work of the Commission, each member, or the deputy of that member, is competent for affairs from the scope of work of the ministry represented by that member or deputy.

If some representatives of the Commission are not able to provide the consent for the requested export within 15 days of the date of the Commission's meeting, and these representatives have not reached the decision on the rejection of the request, the minister competent for the economy (hereinafter: the Minister) shall ask for the written declaration of competent ministers in connection with that request.

The Commission from paragraph 2 of this Article shall be appointed and dismissed by the Minister, on the basis of the proposals of ministers competent for defence, internal affairs, foreign affairs and the economy, and it shall consist of one member and one deputy member from each of the competent ministries. The President of the Commission is the member from the ministry competent for the economy.

The Minister is reaching the Rules of Procedure of the Commission from paragraph 2 of this Article.

### Article 7

Notwithstanding Article 6, paragraph 2 of this Law:

- Licences for the import of goods intended for the Armed Forces of the Republic of Croatia and for the police are issued by the Ministry of Defence and the Ministry of Interior respectively;
- Licences for the export of goods for the needs of the Armed Forces of the Republic of Croatia and the police, with the intent of returning these goods to the country, are issued by the Ministry of Defence and the Ministry of Interior respectively;

- Licences for the export of goods on the basis of the donation of the Government of the Republic of Croatia are issued by the Ministry of Defence, or by the Ministry of Interior if these goods fall within its competence;
- Licences for the export of goods on the basis of international military agreements signed by the Republic of Croatia are issued by the Ministry of Defence;
- Approval for transit of military goods and non-military lethal goods across the territory of the Republic of Croatia is issued by the Ministry of Interior.

### **Article 8**

The Ministry is issuing the export or import licence for each individual export or import.

The licences from paragraph 1 of this Article are issued with the validity period of up to six months and can not be extended.

The form and the content of licences from paragraph 1 of this Article shall be prescribed by the Minister through ordinance.

### **Article 9**

Notwithstanding Article 8, paragraph 1 of this Law, the Ministry may issue a general export licence for the export of military goods of the same type, for one or more countries, taking into account the type of goods, the type and duration of export affairs, and the destination country of the exported goods.

The general export licence can be issued only for the export of armoured or protective equipment, constructions and components from the category ML13 of the List from Article 3 of this Law, with the validity period of up to one year, and can not be extended.

The form and the content of the licence from paragraph 1 of this Article shall be prescribed by the Minister through ordinance.

### **Article 10**

At the request of the importer, the Ministry shall issue the end user certificate for the import of military goods and non-military lethal goods for commercial purposes.

The form and the content of the certificate from paragraph 1 of this Article shall be prescribed by the Minister through ordinance.

### **Article 11**

The export and import of goods, on the basis of this Law, can be performed by legal entities and natural persons – craftsmen (hereinafter: the persons) registered in the Register of Exporters and Importers of Military and Non-Military Lethal Goods for Commercial Purposes (hereinafter: the Register).

Prior to the start of the export or import activity, the persons have the duty to request the registration in the Register from paragraph 1 of this Article.

The Register from paragraph 1 of this Article is kept by the Ministry.

The content and the method of keeping of the Register from paragraph 1 of this Article shall be prescribed by the Minister through ordinance.

### **Article 12**

Registration in the Register from Article 11, paragraph 1 of this Law is conducted on the basis of a written request certified by the stamp and own signature of the responsible person in the legal entity or craft.

The submitter of the request from paragraph 1 of this Article has the duty to submit the following documentation supplementing the request:

- Certified copy of the decision of the Ministry of Interior on the pursuit of activity of production or trade in weapons and ammunition or explosive substances;
- Unique Master Citizen Number or Taxpayer's Identification Number of the person
- Customs Identification Number;
- Certificate of the competent body testifying that the submitter of request, or the responsible person in a legal entity or natural person, is not subject to investigation and has not been penalized for a criminal offence due to illegalities in the procedures with military goods or non-military lethal goods, not older than six months;
- Name of the bank, and the document certified by the bank which is the depositor of the submitter (copies of the most recent final balance sheet and profit and loss account; certificate that the submitter's account has not been blocked in the course of the last six months; copy of the card of deposited signatures);
- Statement on the number and structure of employees;
- Statement by which the responsible person in a legal entity or natural person -craft undertakes the obligation to allow the control conducted by the competent control body over business operations in the area of export and import, as well as the control of storage space and means of transportation.

The Ministry is reaching the decision on the registration in the Register from Article 11, paragraph 1 of this Law.

### **Article 13**

The person registered in the Register from Article 11 of this Law has the duty to submit the information in writing regarding any change of data stipulated in Article 12, paragraph 2, subparagraphs 1 to 5, on the basis of which the person has been registered in the Register, within 15 days of the occurrence of change, and regarding the data from subparagraph 6 of the same Article within 30 days of the occurrence of change.

### **Article 14**

The person shall be deleted from the Register, if:

- New facts are determined, the possession of which at the time of the registration in the Register would have precluded the registration of the person in the Register.
- The responsible person in a legal entity or craft is issued a final judgment for a criminal offence against property, or the responsible person is issued or is already subject to the security measure of ban on the pursuit of activity fully or partly covered by the responsible person's business operation;
- The person is not undertaking business operations in accordance with the provisions of this Law;
- The person is breaching international sanctions;
- The person ceases to pursue his or her activity;
- The person ceases to fulfil the conditions on the basis of which the decision was issued;
- At the request of the person registered in the Register.

## **PROCEDURES PER REQUEST FOR EXPORT AND IMPORT**

### **Article 15**

The request for the issuance of the licence for export or import of goods is submitted to the Ministry on the prescribed form.

The request from paragraph 1 of this Article may contain the goods from only one CN Code, or from only one ML code from the List of Military Goods.

The request for the export of military goods and non-military lethal goods must be supplemented with the import licence issued by the competent body of the country to which the goods are exported, and the original of the end user certificate, certified by the competent body of the country to which the goods are exported.

The import licence from paragraph 3 of this Article is not required as a supplement to the export request if the country of import does not require the import licence to be issued for the corresponding goods.

The end user certificate from paragraph 3 of this Article is not required as a supplement to the export request if the export is temporary for the needs of an exhibition, or if the export is temporary for the purpose of repair of goods at the manufacturer,

or if the exported goods are samples of armoured or protective equipment, construction and components from category ML13 of the List from Article 3 of this Law.

The format and the content of the form stipulated in paragraph 1 of this Article, and the list of documents supplementing the request, shall be prescribed by the Minister through ordinance.

### **Article 16**

The request from Article 15, paragraph 1 of this Law shall be decided upon by the Commission within 15 days of the date of the orderly submitted request, or within 60 days if additional verification is needed in the process of issuance of licence.

### **Article 17**

The Ministry has the duty to issue the requested licence within seven days of the date of receiving the consent of the Commission.

In case when the Commission withholds its consent for the requested export or import, the Ministry has the duty to inform the submitter of request of the impossibility of issuance of the export or import licence, within seven days.

The Ministry shall inform the submitter of request on the reason why the Commission did not provide its consent for the requested export or import, unless the attitude of the Commission is based on the information classified at the appropriate degree of confidentiality by law or by the criteria determined by law, or if the information is protected by the law governing the area of personal data protection.

### **Article 18**

The licence and other documents produced on the basis of this Law are not transferable onto another person.

In case of procedure contrary to paragraph 1 of this Article, the person to whom the licence and other documents are made shall lose all rights arising from this Law.

### **Article 19**

In case the goods are imported for the purpose of export to a third country, the submitter of request has the duty to supplement its export request at the request of the Ministry with the consent of the competent body of the country of origin of the goods, or of the country from which the goods are intended to be imported, which provides consent for the export of these goods to the third country.

In case of export of the goods imported earlier, the Ministry may ask the submitter of request to supplement the export request with the consent regarding the change of the end user of the goods, issued by the competent body of the state from which the goods were imported.

### **Article 20**

In case of reasonable doubt regarding the credibility or legal validity of the attached documentation, the Ministry shall, at the proposal of the Commission, forward the documentation to the competent bodies for further procedure.

### **Article 21**

The Ministry shall reject the request for the issuance of the export or import licence if the Commission determines that the issuance of the requested licence would be contrary to foreign policy or economic interest of the Republic of Croatia, and contrary to the European Union Code of Conduct on Arms Exports, and if:

- The issuance of the licence would endanger the fulfilment of international obligations of the Republic of Croatia;
- The issuance of the licence would endanger the security or defence interests of the Republic of Croatia;
- It is contrary to the national security strategy of the Republic of Croatia;

- The issuance of the licence would enable the outbreak and continuation of armed conflict in the country where the goods would ultimately be used;
- The issuance of the licence would enable the incitement of unrest in the country where the goods would ultimately be used;
- The issuance of the export licence would enable undesirable persons to come to possession of the exported goods, contrary to the will of the exporter;
- It is determined that the goods for which the export licence is requested is subject to police investigation or court disputes;
- The submitter of the request does not amend the incomplete request within 30 days of the date of the reception of notification by the Ministry.

## **Article 22**

In case of the submission of request for the issuance of the export licence to a country belonging to the list of countries subject to the restrictive measures of the UN, EU, OSCE, or other international organisations whose restrictive measures the Republic of Croatia has joined, the licence can be issued only for humanitarian use, or for the needs of the peacekeeping forces.

## **Article 23**

Prior to the signing of the contract on purchase or sale of military goods and non-military lethal goods for commercial purposes, the persons can request the Ministry for an opinion on whether the pursuit of the respective activity with a certain broker, purchaser, importer, end user and the country of end use of the goods would be contrary to the provisions of Article 21 of this Law.

The Ministry has the duty to inform the interested person whether a broker, purchaser, importer, end user or country of end use constitutes a desirable participant in the business affair.

## **Article 24**

The Ministry shall reach a decision on the revocation of the issued licence, if it is determined:

- That one or more conditions on the basis of which the licence was issued no longer exist;
- That the licence was issued on the basis of incorrect or incomplete data, and that the submitter of request had known or must have known that this data is incorrect or incomplete;
- At the request of the person to whom the licence is made.

The Republic of Croatia is not liable for the costs that have been incurred or shall be incurred through the revocation of the issued licence.

Appeal against the decision from paragraph 1 of this Article is not admissible, but administrative dispute can be initiated.

## **Article 25**

The Ministry is keeping the database on the requested, issued, used and revoked licences, and on rejected requests for the export and import of goods and for the provision of services from Article 2 of this Law.

The Ministry has the duty to create the annual report on the export and import of military goods and non-military lethal goods for commercial purposes for the previous year by April 30 of the current year, and to deliver it to the Government of the Republic of Croatia with a classification of confidentiality.

The Ministry has the duty to publish the report from paragraph 2 of this Article on the Internet site of the Ministry by May 30 of the current year, with the exception of confidential data.

The confidential data from paragraph 3 of this Article are names of companies, individual financial indicators, rejected requests and other data in accordance with the Law on Data Protection.

## Article 26

The persons who perform the export or import of goods have the duty to:

- Maintain the special register of transactions that are made according to this Law, and to keep the documentation on transactions and transport for the minimum of 10 years from the performed export or import;
- Respect the deadlines and the conditions under which the licences were issued, and to inform the Ministry on any change that may have arisen;
- Inform the Ministry in writing on any change of data regarding the broker or the end user, within 10 days of the occurrence of change;
- Within 15 days of the performed export or import, inform the Ministry in writing on the performed export or import of goods, and submit the documentation on the basis of which the export or import was performed;
- At the request of the Ministry, deliver the certificate on the reception of goods;
- Respect other obligations arising from the licence and from this Law.

## Article 27

The documentation from Article 26, subparagraph 4 of this Law must contain the following:

- Notification on the performed export or import;
- Copy of the licence on the basis of which the export or import was performed;
- Copy of the customs declaration;
- Serial numbers of weapons;
- Other documentation, depending on the type of goods.

## Article 28

The declarant has the duty to include the following data in the customs declaration from Article 27, subparagraph 3 of this Law:

- Full name and address of the exporter or importer;
- Number of the export or import licence on the basis of which the customs procedure was performed;
- Name of the goods conforming to the name in the subject licence;
- Quantity of the goods expressed in the unit of measurement specified in the subject licence;
- Value of the goods expressed in the currency specified in the subject licence;
- CN code of the goods;
- ML code specified in the List from Article 3 of this Law, if the goods belong to that type of goods.

# SERVICES

## Article 29

The provision of services from Article 2, subparagraph 8 of this Law can be undertaken by the persons registered for the pursuit of activity of production of, or brokering in the goods specified in the List from Article 3 of this Law, in the domestic and international market, with headquarters in the territory of the Republic of Croatia, and registered in the Register of Service Providers for Military Goods.

The Register from paragraph 1 of this Article is kept by the Ministry.

The content and the method of keeping of the Register from paragraph 1 of this Article shall be prescribed by the Minister through ordinance.

## Article 30

The registration in the Register from Article 29, paragraph 1 of this Law is performed on the basis of the written request of the person.



The persons have the duty to supplement the request with the following documentation:

- Certified copy of the decision of the competent body on the registered activity;
- Unique Master Citizen Number or Taxpayer's Identification Number of the person
- Certificate of the competent body that the submitter of request, or the responsible person in the legal entity or natural person – craft, has not been convicted for a criminal offense, and that he or she is not subject to investigation;
- Name of the bank and the document certified by the bank where the person is the depositor;
- Statement on the number and structure of employees;
- Statement by which the responsible person in a legal entity or natural person –craft undertakes the obligation to allow the control conducted by the competent control body over business operations in the area of the provision of services;
- Statement by which the responsible person in a legal entity or natural person – craft authorizes one or more employed persons to perform brokering services on behalf of and in the name of that company.

The Ministry is reaching the decision on registration in the Register from Article 29, paragraph 1 of this Law.

### **Article 31**

The Ministry shall reject the registration in the Register from Article 29 of this Law if:

- False information or documents with the elements of forgery were consciously delivered;
- In the course of the last five years, the submitter of request breached the legislation pertaining to the import, export or transit of military goods or non-military lethal goods, and to the provision of services for military goods;
- In the course of the last five years, the submitter of request breached international sanctions;
- Police investigative measures are being pursued against the submitter of request for illegalities in procedure with military goods or non-military lethal goods;
- Investigative or criminal proceedings are initiated for illegalities in procedure with military goods or non-military lethal goods;
- Indictment was laid, or the person was convicted for illegalities in procedure with military goods or non-military lethal goods;
- Other valid reasons exist.

### **Article 32**

Prior to the start of the provision of service, the person registered in the Register from Article 29, paragraph 1 of this Law has the duty to request from the Ministry the licence for the provision of service.

The licence from paragraph 1 of this Article is issued by the Ministry, on the basis of the consent of the Commission, for each individual activity, with the maximum validity period of up to twelve months, and can not be extended.

The form and the content of the licence from paragraph 1 of this Article shall be prescribed by the Minister through ordinance.

Paragraphs 1 and 2 of this Article do not apply if the technical assistance is provided in the form of the information which is in "public ownership", or which is part of "the fundamental scientific research", and if the provision of services is undertaken for the needs of the Armed Forces of the Republic of Croatia.

### **Article 33**

The request for the issuance of the licence for pursuit of the provision of service is submitted to the Ministry on the prescribed form.

The format and the content of the form from paragraph 1 of this Article, and the list of documents supplementing the request, shall be prescribed by the Minister through ordinance.

### **Article 34**

The provisions of this Law do not pertain to the provider of services participating, on the basis of the decision of the Ministry of Defence or some other state body, within the framework of military or humanitarian missions.

### Article 35

The request from Article 33 of this Law shall be decided upon by the Commission within 15 days of the date of the orderly submitted request, or within 60 days if additional verification is needed in the process of issuance of licence.

### Article 36

The Ministry has the duty to issue the requested licence for the provision of service within seven days of the date of the received consent of the Commission.

In case when the Commission withholds the consent for the provision of service, the Ministry has the duty to inform the submitter of request on the reason why the Commission did not provide its consent for the provision of service, within seven days.

The Ministry shall not inform the submitter of request on the reason why the Commission did not provide its consent for the provision of service, if the attitude of the Commission is based on the information which is classified at an appropriate degree of secrecy on the basis of the law or the criteria determined by law, or if the information is protected by the law governing the area of personal data protection.

### Article 37

The Ministry shall reject the request for issuance of the licence for the provision of services from Article 2 of this Law if the Commission from Article 6, paragraph 2 of this Law determines that the issuance of the requested licence would be contrary to the foreign policy or economic interest of the Republic of Croatia, and contrary to the principles of the European Union Code of Conduct on Arms Exports, and if:

- The issuance of the licence would endanger the fulfilment of international obligations of the Republic of Croatia;
- The issuance of the licence would endanger the security or the defence interests of the Republic of Croatia;
- It is contrary to the national security strategy of the Republic of Croatia;
- The issuance of the licence would enable the outbreak and continuation of armed conflict in the country where the goods would ultimately be used;
- The issuance of the licence would enable incitement of unrest in the country where the goods would ultimately be used;
- The issuance of the licence would enable undesirable persons to come to possession of the exported goods, contrary to the will of the exporter;
- It is determined that the goods for which the licence is requested is subject to police investigation or court disputes;
- The submitter of request does not amend the incomplete request within 30 days of the date of the reception of notification by the Ministry.

### Article 38

The person pursuing the activity of the provision of service for military goods has the duty to:

- Maintain the register of services performed on the basis of the provisions of this Law;
- Respect the time limitations and the conditions under which the licence from Article 32 of this Law was issued;
- Within 15 days of the date of the performed activity of service provision, or upon the expiry of the validity period of the licence from Article 32 of this Law, inform the Ministry in writing on undertaken steps, arising from the licence;
- Keep all the documentation and information connected with that service for the minimum of 10 years upon the performed service;
- Respect other provisions arising from the licence and from this Law.

### Article 39

The Ministry shall decide to annul the decision from Article 30, paragraph 3 of this Law if:

- New facts are determined, the possession of which at the time of the registration in the Register from Article 29 of this Law would have precluded the registration of the person in the Register.
- The responsible person in a legal entity or craft is issued a final judgment for a criminal offence against property, or the responsible person is issued or is already subject to the security measure of ban on the pursuit of activity fully or partly covered by the responsible person's business operation;

- The person is not undertaking business operations in accordance with the provisions of this Law;
- The person is breaching international sanctions;
- The person or the responsible person in a legal entity or craft is issued a final judgment due to illegalities in procedure with military goods or non-military lethal goods
- The person ceases to fulfil the conditions on the basis of which the decision was issued;
- The person discontinues the work;
- At the request of the person registered in the Register.

## CONTROL

### Article 40

The control of the fulfilment of obligations arising from this Law is undertaken by the body issuing the licences, in cooperation with other bodies participating in the procedure of issuance of licences, and other state bodies in accordance with their competences.

The undertaking of control on the basis of this Law includes the control prior to, during and after the issuance of licence.

The written report is created on the results of the undertaken control and it is delivered to the minister competent for the economy.

If irregularities are determined, the minister shall inform the competent state bodies on these irregularities for further procedure.

### Article 41

In the course of the undertaking of control, the control bodies from Article 39, paragraph 1 of this Law may:

- Request information from the submitter of request necessary for the undertaking of control;
- Request information from other state bodies and services necessary for the undertaking of control;
- Request assistance from the competent bodies of other countries, for the purpose of gathering additional information necessary for the undertaking of control;
- Undertake control regarding the fulfilment of obligations arising from the licence;
- Undertake control of the end user of the goods.

The control bodies have the duty to adhere to the provisions in connection with the confidentiality of official, commercial and production secrets, and of persons subjected to control.

### Article 42

For the needs of the fulfilment of tasks determined by this Law, the Ministry, within its competences, collaborates with other state administration bodies and security agencies, and with international organisations and competent bodies of other countries, to which, in accordance with the obligations undertaken by the Republic of Croatia, it delivers appropriate data.

### Article 43

The Ministry has the duty to participate in the exchange of information on export and import activities with other member states of the European Union, including the services.

The participation includes the exchange of information on registered service providers and their activities, and the exchange in the area of legislation.

## PENAL PROVISIONS

### Article 44

Prison sentence of one to five years shall be imposed on a person for whom the judicial bodies of the Republic of Croatia determine to have exported the goods specified in the List from Article 3 of this Law without licence, or on the basis of forged certificate on the end user, and on whoever acts contrary to the provision of Article 29, paragraph 1 and Article 32, paragraph 1 of this Law, to the extent that may endanger:

- The fulfilment of international obligations of the Republic of Croatia, in particular the sanctions;
- Foreign policy interests of the Republic of Croatia.

If the criminal offence from paragraph 1 of this Article caused the death of more persons, or material damage of major proportions, the perpetrator shall be punished by imprisonment for not less than five years.

The same punishment shall be imposed on a natural person – individual pursuing the activities from Article 2, subparagraphs 3, 5 and 8 of this Law without the licence of the Ministry, unless allowed by another law.

## MISDEMEANOR PROVISIONS

### Article 45

Pecuniary penalty in the amount of 100,000.00 to 500,000.00 kuna shall be imposed on a legal entity for misdemeanour, if it is determined that it attempted or succeeded to export the goods specified in the List from Article 3 of this Law without licence, and if the goods were exported on the basis of the licence issued on the basis of incorrect or incomplete data.

Pecuniary penalty in the amount of 20,000.00 to 100,000.00 kuna shall also be imposed on the responsible person in the legal entity for the misdemeanour from paragraph 1 of this Article.

Pecuniary penalty in the amount of 50,000.00 to 100,000.00 kuna shall be imposed on a legal entity for misdemeanour, if it is determined that it attempted or succeeded to export the goods specified in the List from Article 4 of this Law without licence, and if the goods were exported on the basis of the licence issued on the basis of incorrect or incomplete data.

For the misdemeanour from paragraph 1 of this Article, in addition to the pecuniary penalty, the protective measure of the ban on the pursuit of activity of export or import of military goods and non-military lethal goods for commercial purposes can also be issued, in the duration of not less than three months, and not more than one year.

### Article 46

Pecuniary penalty in the amount of 50,000.00 to 100,000.00 kuna shall be imposed on a legal entity or natural person – craftsman for misdemeanour, in case of breach of the provision from Article 13, paragraph 1; Article 26, paragraph 1, subparagraphs 4 and 6; Article 28; and Article 38, paragraph 1, subparagraph 5 of this Law.

### Article 47

Pecuniary penalty in the amount of 1,000.00 to 20,000.00 kuna shall also be imposed on the responsible person in the legal entity for misdemeanour, if acting in contravention of the provisions of Article 26 and Article 38 of this Law.

### Article 48

Pecuniary penalty in the amount of 10,000.00 to 100,000.00 kuna shall be imposed on a legal entity or natural person – craftsman for misdemeanour, if:

- Acting in contravention of the provisions of Article 18 of this Law;
- Acting in contravention of the provisions of Article 26, subparagraphs 1, 2, 3 and 5 of this Law;
- Acting in contravention of the provisions of Article 27 of this Law;
- Acting in contravention of the provisions of Article 38, subparagraphs 1, 2, 3. and 4 of this Law.

#### **Article 49**

Pecuniary penalty in the amount of 10,000.00 to 100,000.00 kuna shall be imposed on a legal entity or natural person for misdemeanour, if:

- Acting in contravention of the provisions of Article 11 of this Law;
- Guilty of misdemeanour from Article 24, paragraph 1, subparagraph 2 of this Law;
- Acting in contravention of the provisions of Article 29 of this Law.

## **TRANSITIONAL AND FINAL PROVISIONS**

#### **Article 50**

The rights arising from individual acts, reached by the competent bodies in connection with the export and import of military goods and non-military lethal goods for commercial purposes, which are not used in full until the date of the beginning of the application of this Law, can be used within the validity periods stipulated by these acts.

#### **Article 51**

Regulations from Articles 3 and 4 of this Law shall be reached by the Government, within 90 days of the date of entry into force of this Law.

#### **Article 52**

Regulations from Articles 6, 8, 9, 10, 11, 15, 29, 30, 32, and Article 33 of this Law, shall be reached by the Minister, within 60 days of the date of entry into force of this Law.

#### **Article 53**

This Law shall be published in the Official Gazette [“Narodne novine”], and it shall enter into force January 1, 2009, with the exception of the provisions of Article 43 of this Law, which shall enter into force on the day of the accession of the Republic of Croatia into the European Union.

## Appendix 15 | Review of implementation of European Union legislation on export control in the Republic of Croatia

Council Common Position 2003/468/CFSP on the control of arms brokering (OJ L 156, 25.6.2003.,p.79)		Council Common Position 2008/944/CFSP defining common rules governing control of export of military technology and equipment (OJ L 335, 13.12.2008,p.99)	
National legal regulations	Status	National legal regulations	Status
Law on the export and import of military and non-military lethal goods (published in the Official Gazette no. 86 of July 18, 2008)	Implementation completed	Law on the export and import of military and non-military lethal goods (published in the Official Gazette no. 86 of July 18, 2008)	Implementation completed

## Appendix 16 | Review of export of military goods according to the methodology of the European Union

### Notes

This review was made in the form in which EU Member States, in accordance with Article 8 of the EU Council Common Position 2008/944, submit their reports on the export of military technology and equipment. (Council Common Position 2008/944/SFSP defining common rules governing control of exports of military technology and equipment).

Row **(a)** presents the number of export licences issued by the Republic of Croatia for each country respectively. Licences are grouped by category as per Military List of the European Union (total of 22 categories).

Row **(b)** presents the financial amounts of licences issued by the Republic of Croatia for each country respectively, classified by categories from the Military List of the European Union. All amounts are presented in EUR. Where licences are issued in other currencies, the conversion into EUR was performed without displaying the value behind the decimal point.

Row **(c)** presents realized financial amounts per individual licences. All amounts are presented in EUR. Where licences are issued in other currencies, the conversion into EUR was performed without displaying the value behind the decimal point.















#	ISO country code	Croatian export to:		Categories from the Common Military List of the European Union (22 categories total)										
				ML 1	ML 2	ML 3	ML 4	ML 5	ML 6	ML 7	ML 8	ML 9		
87	PL		c											
88	SK	Slovakia	a	3										
89	SK		b	138 324										
90	SK		c	13 135										
91	SI	Slovenia	a	2										
92	SI		b	113 555										
93	SI		c	13 340										
94	ES	Spain	a	1										
95	ES		b	27 040										
96	ES		c	0										
97		Other European Countries	a		2		2			4				
98			b		75 417		572 765			326 625				
99			c		75 417		194 030			326 625				
100	BY	Belarus	a											
101	BY		b											
102	BY		c											
103	BA	Bosnia and Herzegovina	a		2									
104	BA		b		75 417									
105	BA		c		75 417									
106	MK	FYROM	a							4				
107	MK		b							326 625				
108	MK		c							326 625				
109	NO	Norway	a											
110	NO		b											
111	NO		c											
112	RU	Russia	a											
113	RU		b											
114	RU		c											
115	TR	Turkey	a				2							



#	ISO country code	Croatian export to:	Categories from the Common Military List of the European Union (22 categories total)																		
			ML 1	ML 2	ML 3	ML 4	ML 5	ML 6	ML 7	ML 8	ML 9										
116	TR		b				572 765														
117	TR		c				194 030														
118		The Middle East	a	6	5	2	1														
119			b	11 053 214	74 337	56 738	61 080														
120			c	1 859 286	42 694	23	61 080														
121	IR	Iran	a																		
122	IR		b																		
123	IR		c																		
124	IQ	Iraq	a	6	4	2	1														
125	IQ		b	11 053 214	53 857	56 738	61 080														
126	IQ		c	1 859 286	22 214	23	61 080														
127	IL	Israel	a		1																
128	IL		b		20 480																
129	IL		c		20 480																
130	OM	Oman	a																		
131	OM		b																		
132	OM		c																		
133	SA	Saudi Arabia	a																		
134	SA		b																		
135	SA		c																		
136	AE	United Arab Emirates	a																		
137	AE		b																		
138	AE		c																		
		TOTAL PER ML category	a	66	7	12	3			1	4								2		
			b	410 162 022	149 754	5 843 178	633 845			107 314	326 625								19 163 607		
			c	27 946 794	118 111	643 302	255 110			107 314	326 625								19 163 607		







REPUBLIC OF CROATIA  
MINISTRY OF ECONOMY, LABOUR  
AND ENTREPRENEURSHIP

