



Global Affairs
Canada

Affaires mondiales
Canada

Canada



2019

EXPORTS of Military Goods

www.exportcontrols.gc.ca



Table of Contents

1. Introduction	- 3 -
Summary of Key Data	- 4 -
2. Canada's Policy on the Export and Brokering of Military Items	- 6 -
Military Goods and Technology – "Groups 2 and 9"	- 7 -
Export and Brokering Permit Assessment Process	- 8 -
Brokering Controls	- 9 -
Notes on the Export of Firearms	- 10 -
International Cooperation on Military Trade	- 11 -
The Canadian Defence, Security and Aerospace Industry	- 11 -
3. Developments in 2019	- 11 -
Coming into Force of Amendments to the Export and Import Permits Act	- 11 -
Introduction of New Brokering Controls	- 12 -
Reporting on ATT Items Exported to the United States	- 12 -
Controlled Exports to Saudi Arabia and Turkey	- 13 -
Export Control List Updates	- 13 -
Export and Brokering Controls Handbook Updated	- 13 -
Export and Import Permits Act Offenses	- 13 -
Export and Import Permits Act Judicial Reviews	- 13 -
Permit Denials	- 14 -
4. Military Export Statistics	- 15 -
Data Interpretation Notes	- 16 -
Exports to the United States of Certain Group 2 (Munitions List) Controlled Items	- 29 -
5. Service Standard Target	- 31 -
6. Annexes	- 32 -
Annex A: Canada's Area Control List (ACL)	- 32 -
Annex B: Canada's Automatic Firearms Country Control List (AFCCL)	- 33 -
Annex C: Canada's International Transfers (Government to Government Transfers)	- 34 -
Annex D: United Nations Register of Conventional Arms (UNROCA)	- 34 -
Annex E: International Cooperation on Military Trade	- 36 -
Annex F: Index of Destinations Considered Lower-Risk in 2019	- 38 -
Annex G: 2019 Exports of Military Goods and Technology by Destination and ECL Item	- 39 -



List of Tables and Charts

Table 1: 2019 – Total Value (\$CAD) of Exports for Military Goods and Technology by NATO and AFCCL Destinations	4 -
Table 2: 2019 – Export Permits Utilized and Value of Exports by Region.....	5 -
Table 3: 2019 – Canada’s Top Twelve Non-U.S. Destinations for Military Goods and Technology.....	6 -
Table 4: 2019 - Export Permit Denials of Military, Dual-Use and Strategic Goods and Technology	14 -
Table 5: 2019 - Summary of Export Permits by all ECL Groups	18 -
Table 6: 2019 - Export Value of Military Goods and Technology to all non-U.S. Destinations.....	20 -
Table 7: 2019 - Top Twelve Non-U.S. Destinations: Utilized Export Permits for Military Goods & Technology.....	22 -
Table 8: 2019 - Number of Utilized Export Permits for Military Goods & Technology by Destination ..	23 -
Table 9: 2019 - Top Twelve Destinations: Issued Export Permits for Military Goods & Technology	25 -
Table 10: 2019 – Group 2 (Munitions List) of Canada’s ECL	26 -
Table 11: 2019 - Exports of Military Goods and Technology by ECL Item Number	28 -
Table 12: 2019 – Number of Permits Utilized and Value Exported for certain Group 2 (Munitions List) Controlled Goods and Technology to the United States	30 -
Table 13: September 1 – December 31, 2019 – Group 9 Exports to the United States	31 -
Table 14: Export Permit Applications Processed (2019-2017)	32 -
Table 15: 2019 - Global Affairs Canada Service Standards for all Military, Dual-use and Strategic Export Permit Applications.....	32 -
Table 16: 2019 – UNROCA: Actual Exports from Canada of Conventional Arms and SALW	35 -
Chart 1: 2019 - Exports of Military Goods and Technology by NATO and AFCCL Destinations.....	5 -
Chart 2: 2019 - Export Value of (non-U.S. destined) Military Goods and Technology – Percentage by Region	6 -
Chart 3: 2019 - Utilized Export Permits for Military Goods and Technology to non-U.S. Destinations - Percentage by Region	22 -
Chart 4: 2019- Exports of Military Goods and Technology by ECL Item Number and Value.....	28 -



1. Introduction

The *Report on the Export of Military Goods* is tabled annually in the Parliament of Canada to promote transparency around Canadian exports of military items. The report provides information on the export of military goods and technology from Canada in a given calendar year. Amendments to the *Export and Import Permits Act* (EIPA) through former Bill C-47, which came into force on September 1, 2019, have made it a legal requirement for the annual report to be tabled in Parliament prior to May 31 of the subsequent calendar year. Prior to this, the report had been produced voluntarily since 1990. The last edition of this report covered 2018 and was tabled in Parliament on June 20, 2019.

2019 was a significant year for Canadian export controls. On September 17, 2019, Canada became a State Party to the Arms Trade Treaty (ATT), after the relevant amendments to the EIPA came into force on September 1, 2019. These amendments have resulted in a more rigorous export assessment process, and require the Minister of Foreign Affairs to deny an export permit if he or she determines there is a substantial risk that the export could violate any of the ATT assessment criteria laid out in the legislation. These legislative amendments, along with a series of new regulations, have also allowed Canada to put in place controls for the brokering of military items, as required by the ATT. Further information on these new measures can be found in sections 2 and 3 of this report.

Moreover, on April 9, 2020, the Minister of Foreign Affairs announced the creation of an arms-length advisory panel of experts that will review best practices regarding arms exports by state parties to the ATT to ensure that Canada's export controls are as robust as possible. The Minister also announced that Canada will spearhead multilateral discussions on means to strengthen international compliance with the ATT.

The data in this report covers exports from Canada in 2019 of goods and technology included in the *Export Control List* that are designed for military purposes. It does not contain information on exports of dual-use or other sensitive items controlled for export. Data for this report is assembled and verified against information received from Canadian industry. Information on how military items are defined for the purposes of export controls is provided in section 2 of this report.

With the exception of those items that require a permit for export to the United States, Global Affairs Canada does not collect data on most military exports to the U.S. As of September 1, 2019, regulatory amendments enabled the collection of information on exports to the U.S. of full-system conventional arms, as defined by the ATT.

Information on Canadian exports of military goods is also captured in two other key reports: the *Annual Report on the Administration of the Export and Import Permits Act*, which is tabled in Parliament, and Canada's submission to the [United Nations Register of Conventional Arms \(UNROCA\)](#). Relevant information will also be available in Canada's initial report to the ATT Secretariat which will be deposited later this year.

Global Affairs Canada welcomes suggestions on how to improve future editions of this report. To submit any suggestions, please contact the Export Controls Policy Division at Global Affairs Canada: expctrlpol@international.gc.ca.



Summary of Key Data

- For the 2019 calendar year, the value of Canadian exports of controlled military goods and technology amounted to a record high of approximately \$3.757 billion.
- The major share by value (\$2.994 billion or 80%) went to countries included on Canada's *Automatic Firearms Country Control List* (AFCCL) that are not also NATO members (see Annex B for the list of AFCCL countries). This is reflective of the fact that export opportunities and growth markets are increasingly outside our NATO partners.
- Saudi Arabia was the largest non-U.S. export destination, receiving approximately \$2.864 billion in Canadian military exports (accounting for approximately 76% of the total value of non-U.S. military exports).
- Belgium was the second largest non-U.S. destination of Canadian military exports, receiving approximately \$151.66 million in military exports (accounting for approximately 4% of all non-U.S. military exports).
- Five other NATO countries were in the top twelve destinations for the same period: Turkey, United Kingdom, Germany, Spain, and the Netherlands.
- Most of Canada's military exports consisted of ground vehicles and their components which accounted for 75.46% of all controlled military exports in 2019 (\$3.018 billion).
- Timelines for processing permits were longer overall in 2019, as the Government has implemented new and more rigorous governance and risk assessment processes to adhere to the ATT requirements. This resulted in a year-on-year 10% decrease in the number of applications processed within the published service standard (82% in 2018 to 72% in 2019).

Table 1: 2019 – Total Value (\$CAD) of Exports for Military Goods and Technology by NATO and AFCCL Destinations¹

Destination	Value	Percentage
NATO Members	\$571,304,847.55	15.20%
Non-NATO AFCCL countries	\$2,994,031,596.85	79.67%
Other countries	\$191,721,239.62	5.12%
Total Non-U.S. Exports of Military Goods and Technology	\$3,757,057,684.02	100.00%

¹ All tables and charts reporting the value of exports, show the value in Canadian dollars of actual exports that took place in 2019, as opposed to the value of permits issued.



Chart 1: 2019 - Exports of Military Goods and Technology by NATO and AFCCL Destinations

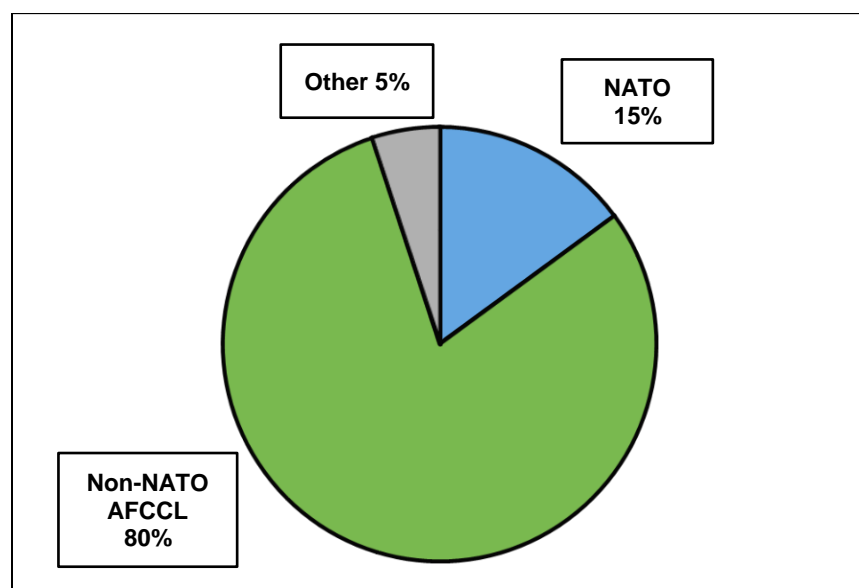


Table 2: 2019 – Export Permits Utilized and Value of Exports by Region²

Region	Number of Permits	Value of Exports
Africa ³	54	\$22,586,992.20
Americas (not including the U.S.)	38	\$5,888,344.93
Asia-Pacific	407	\$183,705,014.49
Europe	1329	\$610,109,266.20
Middle East	461	\$2,934,768,066.20
Total	2289	\$3,757,057,684.02

² Utilized export permits may include permits that were issued in previous years, but which were exported against in 2019. The total number of permits “issued” in 2019 may be found in Table 5.

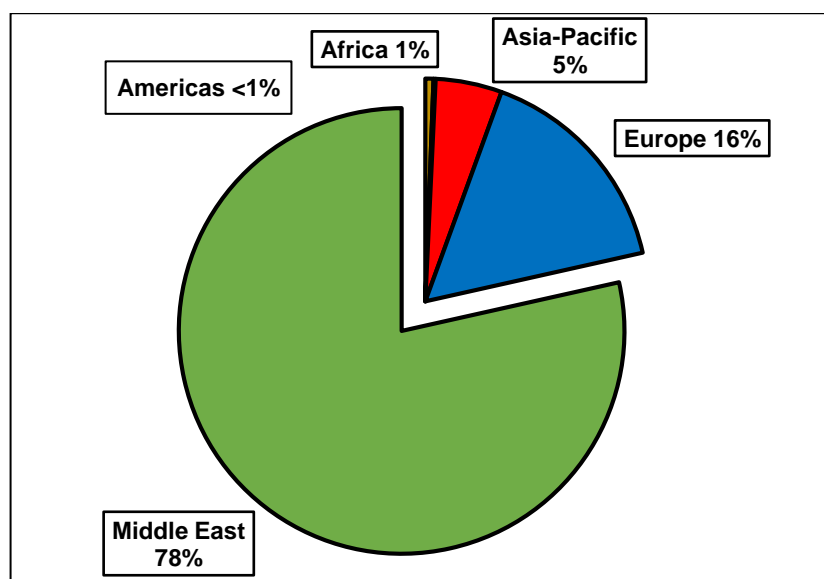
³ Africa includes Egypt and countries of the Maghreb.



Table 3: 2019 – Canada’s Top Twelve Non-U.S. Destinations for Military Goods and Technology

Destination	Total Value	Percentage
Saudi Arabia	\$2,863,785,168.31	76.21%
Belgium	\$151,658,040.67	4.04%
Turkey	\$151,428,455.48	4.03%
United Kingdom	\$116,349,158.52	3.10%
Australia	\$61,399,886.91	1.63%
Singapore	\$39,848,496.72	1.06%
Germany	\$38,989,009.16	1.04%
United Arab Emirates	\$36,641,736.02	0.98%
Japan	\$36,039,485.46	0.96%
Spain	\$24,527,209.51	0.65%
Netherlands	\$22,741,622.80	0.61%
Sweden	\$22,670,662.20	0.60%

Chart 2: 2019 - Export Value of (non-U.S. destined) Military Goods and Technology – Percentage by Region



2. Canada’s Policy on the Export and Brokering of Military Items

The Government of Canada has taken action to strengthen Canada’s export controls, which are among the most rigorous in the world and are in line with those of our principal allies and partners in the major export control regimes. A key priority of Canada’s foreign policy is the maintenance of international peace and security. To this end, the Government of Canada strives to ensure that, among other policy goals, such as supporting Canadian foreign and defence policies and legitimate trade, Canadian goods and technology are not used in a manner that is prejudicial to human rights, peace, security or stability.



This objective is pursued primarily through Canada's system of export and brokering controls, as governed by the *Export and Import Permits Act* (EIPA). This Act requires Canadian individuals and companies who wish to export any items included on the *Export Control List* (ECL), or to broker any items included on the *Brokering Control List* (BCL), to obtain a permit issued by Global Affairs Canada.⁴ The ECL includes military, dual-use, and strategic goods and technology, all U.S.-origin goods and technology, and a limited number of items that are controlled for economic reasons and in compliance with Canada's international trade agreements and obligations. More information on brokering controls and on the types of items controlled in the BCL is provided on pages 9 and 10.

Canada prohibits the export, sale, supply, or shipment of arms and related materiel to countries that are under United Nations Security Council arms embargos, through regulations under the *United Nations Act*. Canada also has autonomous sanctions in place in relation to certain countries through regulations under the *Special Economic Measures Act*,⁵ which prohibit certain activities, including the export of specific goods and technology to those countries, or to any person in those countries, and/or to listed individuals and entities subject to a ban on Canadians dealing with them. Furthermore, the EIPA also provides authority for an *Area Control List* (ACL), a list of countries to which the Governor-in-Council deems it necessary to control the export or transfer of any goods or technology, regardless of whether or not the items are included in the ECL. Currently, only North Korea is listed on the ACL. More information on the ACL can be found in Annex A.

Canada's ECL is based principally on our participation in the major multilateral export control and non-proliferation regimes. Canada's export and brokering controls are not meant to hinder international trade unnecessarily, but to regulate and impose restrictions in response to clear legislative and policy objectives. As outlined above, these objectives include ensuring that Canadian exports and brokering activities abroad are consistent with Canada's foreign and defence policies, including respect for human rights and international peace and security.

Military Goods and Technology – “Groups 2 and 9”

The military goods and technology described in this report are those included in Group 2 (Munitions List) and in its subset Group 9 (Arms Trade Treaty Items) of the ECL.

Goods and technology listed in Group 2 are “specially designed or modified for military use.” These items include, among others, ground vehicles, firearms, ammunition and imaging equipment made specifically for military use. A full list of the categories of Group 2 items is included in Table 10.

Group 9 is a subset of Group 2 and includes the full-system conventional arms that are listed in Article 2 of the ATT, namely: battle tanks; armoured combat vehicles; large-calibre artillery systems; military aircraft; military helicopters; military vessels and submarines; missiles and missile launchers; and small arms and light weapons when destined for police and/or military end-use. Group 9 items require a permit prior to export to all destinations, including the U.S.

⁴ More information about Canada's export controls, including the publication “*A Guide to Canada's Export Control List*”, which contains a full description of the goods and technology controlled under the Export Control List, can be found at www.exportcontrols.gc.ca.

⁵ More information about economic sanctions imposed by Canada, including arms embargoes against a number of countries, can be found at https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/index.aspx?lang=eng



Other controlled items appearing elsewhere on the ECL (such as dual-use and nuclear items) are not featured in this report as they are not specially designed for military use.

Military goods and technology listed in Groups 2 and/or 9 of the ECL are generally exported for one or more of the following purposes:

- sales to military and, in some cases, police forces or other government agencies;
- sales of parts and components for the production of new goods;
- inter-company transfers to affiliates in foreign countries;
- return of military equipment for foreign customers following repair in Canada, and shipments of spare parts;
- sales to private individuals (particularly for firearms). ⁶

Export and Brokering Permit Assessment Process

Under the recent amendments to the *Export and Import Permit Act* made through former Bill C-47, the Minister of Foreign Affairs is legally required to take into account the assessment criteria referred to in Article 7 of the ATT for export and brokering permit applications for arms, ammunition, implements or munitions of war. Specifically, the Minister is required to consider whether the goods or technology specified in the application:

- would contribute to peace and security or undermine it; and
- could be used to commit or facilitate
 - a serious violation of international humanitarian law,
 - a serious violation of international human rights law,
 - an act constituting an offence under international conventions or protocols relating to terrorism to which Canada is a party,
 - an act constituting an offence under international conventions or protocols relating to transnational organized crime to which Canada is a party, or
 - serious acts of gender-based violence or serious acts of violence against women and children.

The amendments made through former Bill C-47 have increased the rigour of the permit assessment process by enshrining these considerations into law.

A further change to the legislation stipulates that the Minister cannot issue an export or brokering permit if, after taking into account the relevant considerations described above, including available mitigating measures, he or she determines that there is a substantial risk that the proposed transaction would result in any of the negative consequences referred to in the ATT assessment criteria. For there to be a substantial risk, there should be a direct and foreseeable risk, based on compelling evidence, that the specific good or technology proposed for export or brokering would result a negative consequence listed in the Act.

⁶ Subsection 84(1) of the *Criminal Code* provides definitions of “non-restricted firearm” and “restricted firearm”.



Additional goals of Canada's overall export and brokering controls regime include:

- ensuring that exports or brokering transactions do not pose a threat to Canada and its allies;
- preventing exports or brokering transactions that would be in violation of Canadian sanctions;
- ensuring that exports or brokering transactions do not contribute to the development of nuclear, biological, or chemical weapons of mass destruction, or of their delivery systems; and
- mitigating the possibility of unauthorized transfer or diversion of the exported or brokered goods and technology.

All applications to export or broker goods or technology are carefully reviewed against the criteria listed above through wide-ranging consultations with geographic, human rights, international security and defence industry experts at Global Affairs Canada (including at Canada's overseas diplomatic missions), the Department of National Defence, and, as necessary, other government departments and agencies. Any concerns raised through this process are then closely evaluated, including whether a substantial risk exists with respect to any of the ATT criteria.

To guide this consultation process, the Department developed an enhanced risk assessment framework for the review of permit applications, laying out the different elements to be considered, the relevant government experts to be consulted, and parameters for the identification of risks. This framework was informed by comments received from industry, civil society, and academia during public consultations on the *Proposed Strengthening of Canada's Export Control Regime*, which the Department conducted from December 13, 2018, to January 31, 2019.

A key consideration in the review of each application is the end-use and end-user of the item. Careful attention is paid to end-use documentation in an effort to ensure that the export or brokering transaction is intended for a legitimate end-user and will not be diverted to ends that would threaten the security of Canada or its allies or violate any of the ATT assessment criteria. Where a substantial risk is identified with respect to any of the ATT criteria, mitigating measures, such as additional end-use assurances, post-shipment controls, or transparency provisions between Canada and the government of the destination country, must be sought. A permit can only be issued if the mitigating measure reduces the risk to less than "substantial".

Brokering Controls

Article 10 of the ATT requires State Parties to take measures to regulate the brokering of arms taking place under its jurisdiction. Under former Bill C-47, Parliament decided to control the brokering activities of persons and organizations in Canada, as well as those activities of Canadians abroad (Canadian citizens, permanent residents, and organizations).

Brokering is defined in the EIPA as "arranging or negotiating a transaction that relates to the movement of goods or technology included in a *Brokering Control List* from a foreign country to another foreign country." The *Brokering Control List*, which comprises all items for which a permit is required prior to engaging in a brokering transaction, includes full-system conventional arms (as defined in Group 9 of the ECL), all items listed in Group 2 of the ECL, as well as any ECL item – including dual-use items –destined to a likely weapons of mass destruction end-use.



If a brokering transaction includes automatic firearms, the country of end-use must be listed on the *Automatic Firearms Country Control List* (AFCCL). In addition, these items may only transit through AFCCL listed countries.

The following scenarios are excluded from the scope of the controls: transfers between affiliates of a corporation, and transactions undertaken by Canadians abroad under the direction of their non-Canadian employer. However, these exemptions do not apply where the item being brokered is a full-system conventional arm controlled under Group 9 of the ECL. Additionally, administrative, and auxiliary services such as transport, financing, and insurance, among others, are not captured by the brokering controls.

General Brokering Permit No. 1 (GBP-1) has been introduced to streamline the authorization of brokering activities involving transactions to low-risk countries (see Annex F). GBP-1 can also be used for brokering transactions if the controlled item is destined for end-use by the Government of Canada. Similar to a General Export Permit, a General Brokering Permit is a type of permit that is issued generally to all persons and organizations as a way to reduce administrative burden, provided that users follow all applicable terms and conditions. Brokers making use of GBP-1 must first notify Global Affairs Canada that they plan to use the GBP and then report on the items and transactions for which they used the permit.

Notes on the Export of Firearms

In terms of the quantity of permits issued, most firearms exports from Canada are intended for sporting or other recreational use and not for military purposes. In addition to the assessment criteria mentioned previously, permit applications for firearms are carefully assessed for the risk that items may be diverted to the illegal arms trade or used to fuel local or regional violence. Canadian diplomatic missions and other sources may provide information about the destination country's firearms control laws, procedures and enforcement practices, and are often called upon to validate import permits and licences, end-user assurances, and consignee information prior to the issuance of a permit.

Prohibited firearms and components thereof may only be exported to countries listed on the *Automatic Firearms Country Control List* (AFCCL) and then only to consignees that are government entities or are authorized by government entities.⁷ The full list of countries on the AFCCL is found in Annex B. On May 1, 2020, the Government of Canada reclassified 1,500 models of firearms and their variants as prohibited, thereby barring their export to non-AFCCL destinations.

The recent changes to Canada's export and brokering controls framework, made through former Bill C-47, did not amend any legislation, regulations or policies related to firearm ownership and domestic transfers in Canada.

⁷ Subsection 84(1) of the *Criminal Code* provides definitions of "prohibited firearm", "prohibited weapon" and "prohibited device".



International Cooperation on Military Trade

Multilateral action is an important means of promoting international peace and security. Canada supports and participates in a range of arms control, export control, and non-proliferation activities, working closely with partners who share our objectives.⁸ Canada participates in the following export control bodies and initiatives: the Arms Trade Treaty, the United Nations Register of Conventional Arms, the Wassenaar Arrangement, the Nuclear Suppliers Group, the Missile Technology Control Regime, the Australia Group, and the Organization for the Prohibition of Chemical Weapons. Further information on these multilateral forums can be found in Annexes D and E.

The Canadian Defence, Security and Aerospace Industry

Canada's defence, security and aerospace industries provide the Canadian Armed Forces, as well as the armed forces of our allies and partners, with the equipment, munitions, and spare parts necessary to meet operational needs. It also makes a valuable contribution to the nation's prosperity, develops high-technology products, and is closely integrated with counterparts in allied countries. According to the 2018 report on the [State of Canada's Defence Industry](#)⁹, the defence industry contributed close to \$6.2 billion in GDP and 59,800 direct and indirect jobs to the Canadian economy in 2016.

3. Developments in 2019

Coming into Force of Amendments to the *Export and Import Permits Act*

On December 13, 2018, former Bill C-47, "*An Act to amend the Export and Import Permits Act and the Criminal Code (amendments permitting the accession to the Arms Trade Treaty and other amendments)*" received Royal Assent. As described above, among other amendments, former Bill C-47 made legislative changes to enable the regulation of arms brokering and to include the ATT export assessment criteria and substantial risk test in the EIPA. The amendments resulting from former Bill C-47 came into force on September 1, 2019.

Other developments in Canada's export control program resulting from former Bill C-47 included:

- Setting May 31 as the date by which the Minister of Foreign Affairs must table in both Houses of Parliament the preceding year's Military Exports Report along with the accompanying *Annual Report on the Administration of the Export and Import Permits Act*; and
- Increasing the maximum fine for a summary conviction offence to \$250,000.

⁸ More information about Canada's non-proliferation and disarmament policies can be found at http://international.gc.ca/world-monde/issues_development-enjeux_developpement/peace_security-paix_securite/nonproliferation.aspx?lang=eng

⁹ The *State of Canada's Defence Industry – 2018* report is produced jointly by Innovation, Science and Economic Development Canada (ISED) and the Canadian Association of Defence and Security Industries (CADSI) and is available online at: https://www.ic.gc.ca/eic/site/ad-ad.nsf/eng/h_ad03978.html



Introduction of New Brokering Controls

Another key development was the coming into force of new brokering controls on September 1, 2019. Four regulations were created that set out the regulatory framework for Canada's brokering controls. The *Brokering Control List* identified the items for which a brokering permit is required. The *Brokering Permit Regulations* specified the information requirements for applications for brokering permits. The *Regulations Specifying Activities that Do Not Constitute Brokering* exempted from the scope of the controls certain activities that technically fall under the definition of brokering. Finally, *General Brokering Permit No. 1* authorizes brokering to certain low-risk destinations. For more information about these new controls, please consult the [brokering regulations](#) online.

As brokering controls came into force on September 1, 2019, the Government of Canada is still in the early stages of its implementation of these new controls and only 18 brokering permit applications were submitted in 2019. Once the controls have been in place for a full calendar year, and additional data is available, future editions of this report will include available information on the types, values, and destinations of the controlled military items subject to Canada's brokering controls, in a manner which does not infringe upon commercial confidentiality.

Reporting on ATT Items Exported to the United States

During the debates on former Bill C-47 and ATT accession, a number of parliamentarians and civil society stakeholders asked for increased transparency in reporting on controlled exports to the United States. At the same time, industry stakeholders noted that the expedited movement of most controlled items between Canada and the United States is vital to the preservation of Canada's close defence relationship with the U.S. and to the viability of Canada's defence, security and aerospace industries. In response to this discussion, the Government of Canada committed to look at ways to increase transparency while maintaining the competitiveness of Canadian businesses and the integrated nature of the bilateral defence relationship.

Therefore, on September 1, 2019, Canada created a new Group in the ECL (Group 9), that lists all items that fall under the scope of the ATT and imposed a permit requirement to export these items to the U.S. (there already existed a permit requirement to export these items to all other destinations). These items are defined in Article 2 of the ATT as the following full-system conventional arms:

- battle tanks;
- armoured combat vehicles;
- large-calibre artillery systems;
- combat aircraft;
- attack helicopters;
- warships;
- missiles and missile launchers; and
- small arms and light weapons when destined for police and/or military end-use.

The amendment to the ECL was accompanied by a new General Export Permit 47 (*GEP-47: Export of Arms Trade Treaty Items to the United States*). GEP-47 requires exporters to notify the Government of Canada of their intent to use the permit and to report twice a year on any permanent exports (i.e. items that will not be returned to Canada within two years) of Group 9 items. Together these two



regulatory amendments allow Canada to increase transparency in the reporting of military exports, as required by Article 13 of the ATT, without unduly burdening Canadian businesses. For more information about these regulations please consult the [Export Controls website](#).

Controlled Exports to Saudi Arabia and Turkey

In October 2018, the Government announced a review of arms export permits to Saudi Arabia and this review continued throughout 2019. During the review no new permits were issued. On April 9, 2020, the Minister of Foreign Affairs announced that the review had been concluded and that new export permits applications would be reviewed on a case-by-case basis to ensure that exports comply with the criteria laid out in the EIPA and the ATT.

On October 11, 2019, the Government temporarily halted the issuance of new export permits to Turkey in light of its military actions in northeastern Syria. Global Affairs Canada released a Notice to Exporters on April 16, 2020, advising that from that date until further notice, permit applications to Turkey would be reviewed on a case-by-case against ATT criteria, with a presumption of denial for Group 2 (military) items, unless exceptional circumstances are found to exist, including in relation to NATO cooperation programs.

Export Control List Updates

On April 5, 2019, the Government of Canada finalized the regulatory process to amend the Export Control List to incorporate Canadian commitments and obligations made at various multilateral export control regimes up to December 31, 2016. This amendment served to add controls, clarify controls and remove controls over specific items. On May 17, 2019, the updated “December 2016” version of the *Guide to Canada’s Export Control List* formally came into effect.

The “December 2018” edition of the Guide to Canada’s Export Control List came into effect on May 1, 2020, incorporating regime commitments made up until December 31, 2018.

Export and Brokering Controls Handbook Updated

In preparation for the coming into force of the changes to Canada’s export controls program on September 1, 2019, the Export Controls Policy Division updated the *Export and Brokering Controls Handbook*. The updated handbook provides a comprehensive overview of Canada’s export control policies and includes information to assist clients in applying for export and brokering permits. The handbook can be accessed online at: https://www.international.gc.ca/trade-commerce/controls-controles/reports-rapports/ebc_handbook-cce_manuel.aspx?lang=eng

Export and Import Permits Act Offenses

There were no convictions for offences under the EIPA during the 2019 calendar year.

Export and Import Permits Act Judicial Reviews

There were three judicial reviews in relation to Group 2 (Munitions List) export permits during the 2019 calendar year, one of them ongoing.



Daniel Turp v. Minister of Foreign Affairs (1st and 2nd Judicial Reviews)

On 11 April 2019, the Supreme Court of Canada denied Mr. Turp's application for leave to appeal in his first judicial review. Following the Supreme Court's refusal to hear his first judicial challenge, Mr. Turp discontinued his second judicial review on 9 May 2019, which had been stayed pending the Supreme Court's decision.

Daniel Turp v. Minister of Foreign Affairs (3rd Judicial Review)

On 10 October 2019, Mr. Turp commenced a third application for judicial review against the Minister's purported failure to cancel all existing permits for the export of Light Armoured Vehicles to the Kingdom of Saudi Arabia. In his application, Mr. Turp alleges that all parties to the Yemeni Civil War, including the members of the Saudi-led international coalition, have committed serious violations of international humanitarian law and international human rights law. Mr. Turp seeks a *mandamus* order from the Federal Court requiring the Minister to cancel all existing permits for the export of Light Armoured Vehicles to Saudi Arabia. In the alternative, Mr. Turp seeks an order from the Federal Court instructing the Minister to suspend all existing permits for these exports, pending a review by the Department to determine whether they comply with the EIPA and the ATT. This application is still pending before the Federal Court.

Permit Denials

In 2019, four applications for permits to export military, dual-use, and strategic goods or technology were denied for reasons pertaining to Canada's foreign and defence policy. Another application to export a prohibited weapon was denied as the destination country was not listed on the AFCCL. Table 4 includes information on applications that were denied in 2019, including those that were submitted prior to January 1, 2019.

It is important to note that each year, a number of permit applications are withdrawn at the request of the exporter if the company becomes aware, or is otherwise informed, of commercial, political or other types of risk that may affect their application and decides not to pursue the commercial opportunity. For the number of export permit applications withdrawn in 2019 please see Table 5.

Table 4: 2019 - Export Permit Denials of Military, Dual-Use and Strategic Goods and Technology ¹⁰

ECL Number	Destination	Reason for Denial
2-1	Ireland	Destination country is not an AFCCL country
2-21	Vietnam	Canadian foreign and defence policy
2-3	Thailand	Canadian foreign and defence policy
1-9	China	Canadian foreign and defence policy
2-1	Guatemala	Canadian foreign and defence policy

¹⁰ See "A Guide to Canada's Export Control List" (see www.exportcontrols.gc.ca) for examples of ECL items listed under the ECL numbers outlined in Table 4.



4. Military Export Statistics

The statistics contained in this report are obtained from permit utilization reporting, which exporters must provide to Global Affairs Canada consistent with the conditions listed on export permits for military goods and technology. The data displayed below includes the country of destination, the ECL item under which the export is controlled, and the value in Canadian dollars.

Further details related to export transactions (for example, names of exporting companies, values of individual contracts and transactions, and details of the specific technologies being exported) are protected due to the commercially confidential nature of such information.

Export controls apply to all foreign destinations. However, due to Canada's close and long-standing military cooperation with the United States, including the 1956 Defence Production Sharing Agreement that underpins the integrated nature of North America's defence industry, Canada and the United States have reciprocal arrangements to ensure permit-free/licence-free movement of most military items between our two countries. For Canada, this has meant permit exemptions for most Group 2 exports destined to the United States. Consequently, Global Affairs Canada does not collect data on most exports of military items to the United States, except for exports of Group 9 goods and a small sub-set of goods for which individual permits are required, such as prohibited firearms, related parts and ammunition, and select items controlled under ECL number 2-4 (see Tables 12 and 13).

Data on Canadian military exports may be available from other sources such as Statistics Canada. These figures are derived from data collected by the Canada Border Services Agency based on the Harmonized Commodity Description and Coding Systems (HS), and may include non-military goods such as: commercial computers; civil-certified aircraft; guns and ammunition designed exclusively for industrial uses, such as the lighting of gas flares at oil wells; or other civilian equipment. Since there is no direct correlation between the commodity codes used by Statistics Canada and the ECL numbers, and because each source uses different methods of data collection, a meaningful comparison of the information from these sources is not possible.

An internationally accepted standard for statistics on worldwide military trade is the United Nations Register of Conventional Arms (UNROCA) (see Annex D). The Register quantifies the number of complete weapon systems permanently exported and does not include parts, components or the wide assortment of non-lethal support systems (such as radar equipment, simulators and software designed for military use) that make up a significant component of Canada's military exports. Since 1991, Canada has consistently submitted annual voluntary reports to UNROCA. In 2020, Canada will submit to the ATT Secretariat a similar public report on the export and import of full-system conventional arms recently listed under Group 9.

Global Affairs Canada also produces an Annual Report to Parliament on the Administration of the *Export and Import Permits Act*, which is also a statutory requirement under the EIPA. This report provides an overview of permit data and service standards, which includes Group 2 permits and is also available at: <http://www.international.gc.ca/controls-controles/report-rapports/index.aspx?lang=eng>.



Data Interpretation Notes

The following data interpretation notes apply:

- i) Procurement contracts awarded by governments may have very high values and extended delivery schedules; a single contract may account for a large share of total military exports in a given year or over multiple years. Major changes in totals from one year to another may be explained by the beginning or end of a small number of high-value contracts.
- ii) Other than Table 9 and Tables 12, 13, and 16, the data presented does not include information on exports of military goods and technology to the United States. Data on permit applications for exports to the United States is included in Tables 5, 14, and 15.
- iii) The ECL item numbers used are explained with illustrative examples. Detailed descriptions of all strategic goods and technology controlled under the EIPA, can be found in *“A Guide to Canada’s Export Control List”*, which is available at www.exportcontrols.gc.ca.
- iv) Readers will notice that some of the totals vary between tables. For instance, Table 6 reports annual values of total exports of military goods and technology by destination country; whereas Annex G breaks down the value of exports to individual countries according to the ECL item number. However, the total of exports by ECL item number to an individual country calculated from Annex G may be greater than the total value of exports to that destination reported in Table 6. This is because goods or technology included in a single export permit may be classified under multiple ECL item numbers. Table 11, Chart 4, and Annex G therefore, contain some double-counting, which inflates the value of total exports.
- v) Table 10 references transfers of “technology” controlled under item 2-22 of the ECL. Transfers of this nature often cannot be easily quantified. For this reason, “lots” rather than unit quantities are commonly used where technology may be transferred via intangible means (such as through meetings or emails). The “value” assigned such technology transfers is determined by exporter in their reporting. The inclusion of such data within this report is consistent with past practice.
- vi) A multi-destination permit (or MDP) allows exports to multiple countries under a single permit. Group 2 MDPs only allow exports to like-minded countries that are members of the export control regimes to which Canada is party, and that have an effective system of export controls. MDPs are offered to exporters who have an exporting history with Global Affairs Canada. These exporters have implemented defined due diligence processes and procedures when planning, marketing and shipping ECL items to foreign clients to ensure a reasonable level of assurance that goods or technology will not be exported to unauthorized or illegitimate end-uses or end-users. The values exported under MDPs are included in all the tables reporting the total value of military exports. However, Tables 2, 7, 8, 11 and 12, along with Chart 3, do not include the number of MDPs utilized per destination as a single permit can cover exports to multiple destinations.
- vii) The number of Group 2 permits issued in 2019 (reported in Table 5 as 3201) does not equal the number of Group 2 permits utilized in 2019 (reported in Table 8 as 2289) because a single permit issued in any given year can be valid for up to a period up to five years and be exported against during any of the years in which it is valid.



viii) Exporters are not required to submit permit utilization reports to Global Affairs Canada for Group 2 exports where no value is being transferred. Examples include exports where goods were sent to Canada for warranty repair, and are being returned to the original owner; exports where goods were sent to Canada for testing, demonstration or trials, and are being returned; the return to foreign owners of controlled goods borrowed or leased by a Canadian company (e.g., deactivated automatic firearms used as movie props); exports of faulty or discrepant material; or exports of goods for destructive testing. Exports of such nature are omitted from this report.



Table 5: 2019 - Summary of Export Permits by all ECL Groups¹²

	Submitted Applications	Issued	Denied	Returned Without Action	Withdrawn	Cancelled or Suspended	Under Review
Group 1 (Dual-Use List)	1583	1299	0	25	44	7	208
Group 2 (Munitions List)	3563	3201	1	49	71	35	206
Group 3 (Nuclear Non-Proliferation List)	115	89	0	0	6	2	18
Group 4 (Nuclear-Related Dual-Use List)	148	108	0	3	5	3	29
Group 5 (Miscellaneous Goods and Technology)	279	207	0	4	49	2	17
Group 6 (Missile Technology Control Regime List)	185	152	0	4	9	3	17
Group 7 (Chemical and Biological Weapons Non-Proliferation List)	87	63	0	11	5	1	7
Group 9 (Arms Trade Treaty)	2	2	0	0	0	0	0
Others ¹¹	298	3	0	52	231	3	9
Totals	6260	5124	1	148	420	56	511

¹¹ The category “other” includes applications that were not assigned to an ECL Group either because they were withdrawn or returned without action prior to a technical assessment being conducted or because the item in question required a permit for export to a destination listed on the Area Control List.

¹² The data in this table is also reported in the 2019 “Annual Report to Parliament on the Administration of the *Export and Import Permits Act*.” Data is drawn from Export Controls Online (EXCOL), an online database used to process export permit applications. The information on EXCOL is not publicly available. Unlike the information presented elsewhere in this report, which only covers Group 2 (Munitions List) items, this table covers all export permit applications submitted in 2019 for all ECL groups. Group 2 (Munitions List) is highlighted.



Notes for Table 5

Submitted Applications: Table 5 includes data on all export permit application submitted between January 1 and December 31, 2019. It does not include information on applications that were submitted prior to 2019 nor does it include information on export permit amendment requests. Items in an export permit application may be assessed under more than one ECL Group. To avoid counting the same application twice, applications containing more than one ECL assessment have been assigned to a single Group based on the following order of precedence: 9, 2, 1, 3, 4, 6, 7, 5. Therefore, an application containing both a Group 9 assessment and a Group 2 assessment will appear once in the Group 9 row and an application containing both a Group 6 and a Group 5 assessment will only appear in the Group 6 row. The status of all export permit applications reflected in the table is accurate as of March 9, 2020.

Issued: Means a permit has been approved and issued. If a permit was issued in 2019 and is subsequently cancelled, it is only counted once in the cancelled or suspended column. Permits that were issued in 2019 but have since expired are also counted in the issued column.

Denied: Means a permit that was denied by the Minister of Foreign Affairs, either directly by the Minister or by departmental officials further to policy direction received from the Minister. This occurs in fewer than 1% of cases annually and is generally for reasons related to Canada's foreign and defence policies, as provided in the criteria for controlling the export of military, dual use and strategic goods outlined above. Information on denials is also reported in Table 5. Please note that Table 4 includes information on applications that were denied in 2019, including those that were submitted prior to January 1, 2019. Table 5 includes information on applications that were submitted in 2019 that had been denied up to March 9, 2020. The variance between Tables 4 and 5 is due to the fact that Table 4 includes applications that were submitted prior to 2019.

Returned without action: A permit application is returned without action by Global Affairs Canada if it is administratively incomplete, or if there is inconsistent information. A company that still wishes to pursue the export would be required to submit a new permit application.

Withdrawn: Permit applications may be withdrawn either at the request of the exporter or if the exporter is advised by Global Affairs Canada that a permit is not required. An exporter may decide to withdraw their application if the permit is no longer required because the commercial contract has fallen through, if a change to the contract requires them to resubmit the information under a separate application, or if the exporter becomes aware of political, commercial, or other types of risk that may affect their application and decides not to pursue the opportunity. An application may also be withdrawn if the goods or technology proposed for export are not controlled, if the items are controlled but a permit is not required for their export to the U.S., or if a General Export Permit applies. All of these situations are captured in the category of withdrawn permits. In 2019, a total of 214 applications were withdrawn because an individual export permit was not required. The remaining 206 withdrawals were at the request of the company.

Cancelled or Suspended: An export permit that has been issued may be cancelled for administrative reasons (e.g., at the request of the applicant as the permit is no longer required, or due to an error on the permit requiring replacement by a new permit), or for policy reasons at the direction of the Minister of Foreign Affairs. An export permit that has been cancelled is no longer valid for the export of goods or technology. An issued export permit can be suspended for policy reasons and reinstated later.

Under Review: Includes applications submitted in 2019 that as of March 9, 2020 were not completely processed or were otherwise under review.



Table 6: 2019 - Export Value of Military Goods and Technology to all non-U.S. Destinations

Destination	Value of Military Exports
Afghanistan	\$790.08
Algeria	\$17,149,621.61
Argentina	\$12,802.00
Armenia	\$1,453.20
Australia	\$61,399,886.91
Austria	\$1,092,534.90
Belarus	\$605.36
Belgium	\$151,658,040.67
Botswana	\$1,244,659.68
Brazil	\$710,217.11
Brunei Darussalam	\$3,569.89
Bulgaria	\$459,092.75
Chile	\$2,910,993.37
China	\$250.00
Croatia	\$1,900.00
Cuba	\$129.99
Cyprus	\$25,940.00
Czech Republic	\$424,241.78
Denmark	\$2,974,687.65
Egypt	\$118,713.42
Finland	\$3,998,073.05
France	\$20,336,678.54
French Polynesia	\$619.97
Gambia	\$197,092.00
Georgia	\$1,063.99
Germany	\$38,989,009.16
Greece	\$1,190,389.00
Haiti	\$739.00
Hong Kong	\$12,174.31
Hungary	\$105,918.86
Iceland	\$5,718.00
India	\$1,823,627.85
Indonesia	\$2,738,360.44
Ireland	\$107,574.92
Israel	\$13,744,727.53
Italy	\$20,605,738.27
Japan	\$36,039,485.46
Jersey	\$1,805.48



Destination	Value of Military Exports
Jordan	\$45,638.77
Kazakhstan	\$2,900.82
Kenya	\$47,383.31
Korea (South), Republic of	\$16,770,446.87
Kuwait	\$457,681.48
Latvia	\$1,345,533.00
Lithuania	\$27,295.94
Luxembourg	\$3,606,245.72
Malaysia	\$73,816.00
Malta	\$24,660.00
Mexico	\$1,517,790.57
Mongolia	\$399.99
Morocco	\$352,367.05
Netherlands	\$22,741,622.80
New Caledonia	\$1,466.95
New Zealand	\$3,927,846.09
Niger	\$12,813.86
Nigeria	\$1,605,548.91
Norway	\$7,372,690.47
Oman	\$1,320.00
Peru	\$734,960.49
Philippines	\$458.00
Poland	\$6,499,534.16
Portugal	\$49,713.15
Qatar	\$20,091,794.09
Romania	\$397,896.12
Russian Federation	\$2,193.94
Saudi Arabia	\$2,863,785,168.31
Singapore	\$39,848,496.72
Slovakia	\$7,065.00
Slovenia	\$201,013.00
South Africa	\$1,858,792.36
Spain	\$24,527,209.51
Sweden	\$22,670,662.20
Switzerland	\$8,491,360.74
Taiwan	\$17,741,679.54
Thailand	\$2,392,052.60
Turkey	\$151,428,455.48
Turks and Caicos Islands	\$712.40
Ukraine	\$2,386,490.87



Destination	Value of Military Exports
United Arab Emirates	\$36,641,736.02
United Kingdom	\$116,349,158.52
Uzbekistan	\$616,000.00
Vietnam	\$310,686.00
Total	\$3,757,057,684.02

Chart 3: 2019 - Utilized Export Permits for Military Goods and Technology to non-U.S. Destinations - Percentage by Region¹³

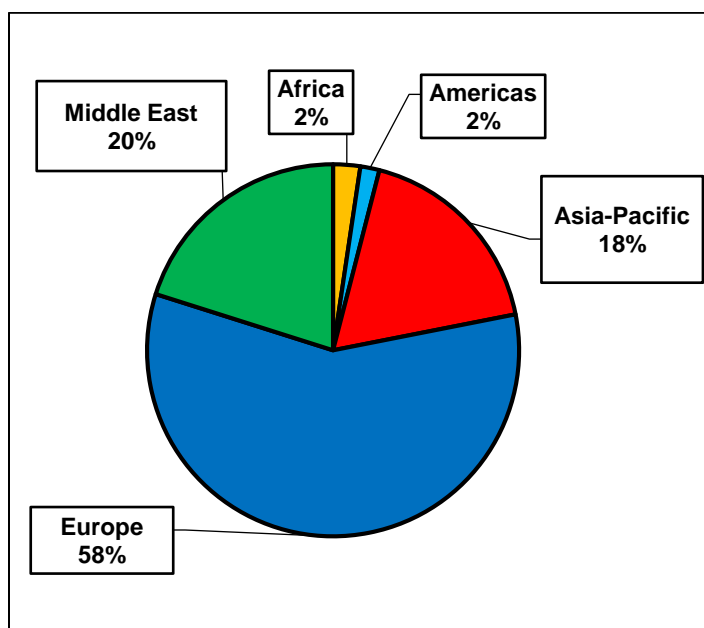


Table 7: 2019 - Top Twelve Non-U.S. Destinations: Utilized Export Permits for Military Goods & Technology

Destination	Number of Permits Utilized in 2019	Percentage
Israel	401	17.50%
United Kingdom	327	14.27%
Germany	184	8.03%
France	162	7.07%
Australia	127	5.54%
Switzerland	72	3.14%
Turkey	63	2.75%

¹³ Does not include Multi-Destination Permits. See data interpretation note vi. on page 16.



Destination	Number of Permits Utilized in 2019	Percentage
Italy	62	2.71%
Japan	61	2.66%
Spain	60	2.62%
Netherlands	59	2.57%
New Zealand	49	2.14%

Table 8: 2019 - Number of Utilized Export Permits for Military Goods & Technology by Destination¹⁴

Destination	Number of Utilized Export Permits
Afghanistan	1
Algeria	7
Argentina	4
Armenia	1
Australia	127
Austria	11
Belarus	1
Belgium	33
Botswana	6
Brazil	5
Brunei Darussalam	2
Bulgaria	4
Chile	10
China	1
Croatia	1
Cuba	1
Cyprus	2
Czech Republic	19
Denmark	31
Egypt	2
Finland	17
France	162
French Polynesia	2
Gambia	2
Georgia	1

¹⁴ Permits issued in any given year can be valid for up to a period up to five years and be exported against during any of the years in which it is valid. The number of permits utilized in 2019 does not equal the number of permits issued in 2019. Table 8 does not contain data from Multi-Destination Permit exports. See data note vi on page 16



Destination	Number of Utilized Export Permits
Germany	184
Greece	2
Haiti	2
Hong Kong	1
Hungary	6
Iceland ¹⁵	---
India	32
Indonesia	5
Ireland	7
Israel	401
Italy	62
Japan	61
Jersey	1
Jordan	3
Kazakhstan	3
Kenya	3
Korea (South), Republic of	39
Kuwait	2
Latvia	1
Lithuania	4
Luxembourg	17
Malaysia	5
Malta	1
Mexico	12
Mongolia	1
Morocco	4
Netherlands	59
New Caledonia	2
New Zealand	49
Niger	1
Nigeria	4
Norway	46
Oman	1
Peru	3
Philippines	1
Poland	39
Portugal	13

¹⁵ All reported exports to Iceland in 2019 took place under a Multi-Destination Permit.



Destination	Number of Utilized Export Permits
Qatar	3
Romania	11
Russian Federation	5
Saudi Arabia	22
Singapore	31
Slovakia	1
Slovenia	5
South Africa	25
Spain	60
Sweden	48
Switzerland	72
Taiwan	16
Thailand	25
Turkey	63
Turks and Caicos Islands	1
Ukraine	12
United Arab Emirates	29
United Kingdom	327
Uzbekistan	1
Vietnam	2
Total	2289

Table 9: 2019 - Top Twelve Destinations: Issued Export Permits for Military Goods & Technology

Destination	Number of Permits Issued in 2019	Percentage of Total
United Kingdom	512	15.83%
Israel	311	9.62%
Germany	250	7.73%
France	228	7.05%
South Africa	205	6.34%
Australia	180	5.57%
United States	88	2.72%
Switzerland	84	2.60%
Italy	80	2.47%
Spain	73	2.26%
New Zealand	65	2.01%
Turkey	65	2.01%



Table 10: 2019 – Group 2 (Munitions List) of Canada’s ECL

ECL Item	Illustrative Examples¹⁶
2-1	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
2-2	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
2-3	Ammunition and fuse-setting devices, and specially designed components
2-4	Bombs, torpedoes, rockets, missiles, other explosive devices and charges, and related equipment and accessories specially designed for military use; and specially designed components
2-5	Fire control, 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
2-6	Ground vehicles and components
2-7	Chemical or biological toxic agents, riot control agents, radioactive materials, and related equipment, components and materials
2-8	Energetic materials and related substances
2-9	Vessels of war, special naval equipment and accessories, and components specially designed for military use
2-10	Aircraft, lighter-than-air vehicles, unmanned airborne vehicles, aero-engines and aircraft equipment, related equipment and components, specially designed or modified for military use
2-11	Electronic equipment, military spacecraft and components not controlled elsewhere
2-12	High-velocity kinetic energy weapon systems and related equipment, and specially designed components
2-13	Armoured or protective equipment and constructions and components
2-14	Specialized equipment for military training or for simulating military scenarios, simulators specially designed for training in the use of any firearm or weapon controlled in 2-1 or 2-2, and specially designed components and accessories

¹⁶ The full description of goods and technology, including precise definitions of the terms used in the table, may be found in *A Guide to Canada’s Export Control List*, available at www.exportcontrols.gc.ca.



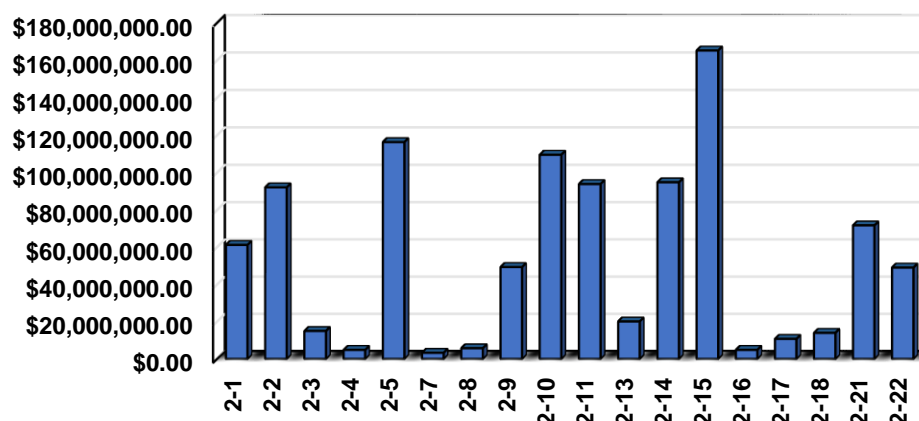
ECL Item	Illustrative Examples ¹⁶
2-15	Imaging or countermeasure equipment, specially designed for military use, and specially designed components and accessories
2-16	Forgings, castings and other unfinished products the use of which in a controlled product is identifiable by material composition, geometry or function, and which are specially designed for any products controlled in 2-1 to 2-4, 2-6, 2-9, 2-10, 2-12 or 2-19
2-17	Miscellaneous equipment, materials, libraries and specially designed components
2-18	Equipment for the production of products referred to in the Munitions List
2-19	Directed energy weapon systems, related or countermeasure equipment and test models, and specially designed components
2-20	Cryogenic and superconductive equipment, and specially designed components and accessories
2-21	Software
2-22	Technology



Table 11: 2019 - Exports of Military Goods and Technology by ECL Item Number¹⁷

ECL Number	Total Value	Percent of Total Value	Permits Utilized	Percent of Permits Utilized
2-1	\$61,206,739.37	1.53%	1484	29.02%
2-2	\$92,117,063.09	2.30%	38	0.74%
2-3	\$14,985,957.22	0.37%	69	1.35%
2-4	\$4,838,440.02	0.12%	57	1.11%
2-5	\$115,509,955.92	2.91%	246	4.83%
2-6	\$3,018,233,357.02	75.46%	202	3.95%
2-7	\$3,282,951.03	0.08%	40	0.78%
2-8	\$5,731,218.71	0.14%	5	0.10%
2-9	\$49,334,282.64	1.23%	103	2.01%
2-10	\$109,530,365.72	2.74%	833	16.29%
2-11	\$93,885,280.59	2.35%	565	11.05%
2-12	\$0.00	0.00%	0	0.00%
2-13	\$20,084,147.44	0.50%	19	0.37%
2-14	\$94,840,125.50	2.37%	121	2.37%
2-15	\$165,223,263.90	4.13%	442	8.68%
2-16	\$4,837,826.20	0.12%	67	1.31%
2-17	\$10,755,214.97	0.27%	52	1.02%
2-18	\$13,992,588.17	0.35%	139	2.72%
2-19	\$0.00	0.00%	0	0.00%
2-20	\$0.00	0.00%	0	0.00%
2-21	\$71,713,221.01	1.79%	204	3.99%
2-22	\$49,049,758.29	1.23%	425	8.31%

Chart 4: 2019- Exports of Military Goods and Technology by ECL Item Number and Value¹⁸
(Without ECL Item 2-6: "Ground vehicles and components")



¹⁷ Data contains some double counting. See data interpretation notes on p.16, note iv.

¹⁸ Data contains double counting as some items can be classified under more than one ECL number. See data interpretation notes on p.16, note iv.



Exports to the United States of Certain Group 2 (Munitions List) Controlled Items

Global Affairs Canada collects data on military exports to the United States for all Group 9 goods and for Group 2 items only if they require a permit to be exported to the United States.

Within Group 2 of the ECL, export permits are required to the United States in the following circumstances:

- All exports of prohibited firearms controlled under item 2-1 (e.g. automatic weapons) or 2-2 (e.g. weapons with a calibre greater than 12.7mm) of the ECL must be authorized in advance with an export permit. Details on the application process can be found in the *Export and Brokering Controls Handbook* at https://www.international.gc.ca/trade-commerce/controls-controles/reports-rapports/ebc_handbook-cce_manuel.aspx?lang=eng
- Any ammunition controlled under item 2-3 of the ECL that is destined for end-use by police or military agencies. Permits are not required for the export of sporting ammunition.
- Goods controlled under item 2-4.a (e.g. bombs, torpedoes, rockets, missiles etc.) of the ECL.

In 2019, 266 export permits were utilized for the export to the United States of goods controlled under Group 2 (Munitions List) of the ECL. See Table 12 for more detailed information.

Goods exported from Canada to the U.S. are thereafter subject to U.S. export controls regardless of whether a Canadian export permit was required. Goods exported from Canada through the U.S. to a third country (i.e., transit/transshipment) require a Canadian export permit for the third country when they leave Canada.

Permits are also required for the export to the United States of certain goods controlled on other ECL Groups, including all items in Group 3 (the Nuclear Non-Proliferation List), all items in Group 4 (the Nuclear-related Dual-Use List), most items in Group 5 (Miscellaneous Goods and Technology), and certain items in Group 6 (the Missile Technology Control Regime List) and Group 7 (the Chemical and Biological Weapons Non-Proliferation List).



Table 12: 2019 – Number of Permits Utilized and Value Exported for certain Group 2 (Munitions List) Controlled Goods and Technology to the United States

ECL	Type of goods	Permits Utilized	Value	Notes
2-1	Smooth-bore weapons with a calibre of less than 20 mm, other arms and automatic weapons with a calibre of 12.7 mm (calibre 0.50 inches) or less and accessories, and specially designed components therefor	213	\$29,340,638.48	- An export permit is required for all prohibited firearms regardless of destination. - Both temporary and permanent exports of either Restricted or Non-Restricted firearms to the United States may be made without obtaining an individual export permit. Exports of Restricted or Non-Restricted firearms are authorized by GEP-47 with a reporting requirement for those exports for police and/or military end-use. -1062 prohibited firearms (ECL 2-1) were exported to the U.S. for commercial end-use in 2019.
2-2	Smooth-bore weapons with a calibre of 20 mm or more, other weapons or armament with a calibre greater than 12.7 mm (calibre 0.50 inches), projectors and accessories, as follows, and specially designed components therefor	1	\$5,975.00	
2-3	Ammunition and fuze setting devices, and specially designed components therefor	8	\$152,953.13	- Both temporary and permanent exports of sporting ammunition to the United States may be made without obtaining an individual export permit. Such exports are authorized under GEP-47.
2-4	Bombs, torpedoes, grenades, smoke canisters, rockets, mines, missiles, depth charges, demolition-charges, demolition-devices, demolition-kits, "pyrotechnic" devices, cartridges and simulators (i.e., equipment simulating the characteristics of any of these items), specially designed for military use; Note that item 2-4 includes: Smoke grenades, fire bombs, incendiary bombs and explosive devices; missile rocket nozzles and re-entry vehicle nosetips.	44	\$33,975,965.89	- The description of this category is taken from control text agreed at the Wassenaar Arrangement. As a party to the <i>Ottawa Treaty</i> , the production and export of mines is prohibited in Canada. Further to the <i>Convention on Cluster Munitions</i> , Canada also does not manufacture or export cluster bombs. - Individual export permits are still required for items controlled under ECL item 2-4a.
	Total	266	\$63,475,532.50	



Table 13: September 1 – December 31, 2019 – Group 9 Exports to the United States

ECL Item Number	Quantity Exported
9-1 Battle tanks	---
9-2 Armoured combat vehicles	48
9-3 Large-calibre artillery systems	---
9-4 Military aircraft and related systems	---
9-5 Military helicopters and related systems	---
9-6 Vessels and submarines that are armed and equipped for military use	---
9-7 Missiles and missile launchers	---
9-8 Small arms for police or military end-use	---
9-9 Light weapons for use by members of armed or security forces and delivering primarily direct fire	---

5. Service Standard Target

Further to the information found in the Export and Brokering Controls Handbook, the processing time for applications for export permits to low-risk destinations that contain all required supporting documentation is 10 working days, and for complete applications for export permits to other destinations the processing time is 40 working days. The performance target for achieving this standard is set at 90 percent. For a list of destinations considered low-risk please refer to Annex F.

All export permit applications for military items, regardless of the country of destination, are assessed on a case-by-case basis against the ATT assessment criteria. However, applications for export permits to non-low-risk countries are subject to a more comprehensive assessment process, based on a risk assessment of the items being exported, the consignee country, and the intended end-use and end-user. These assessments are conducted through intra- and inter-departmental consultations to evaluate the risks and implications of the proposed exports with respect to the mandatory ATT assessment criteria, as well as considerations around Canada's foreign and defence policy and national security. Various Canadian government departments and agencies, including multiple divisions within Global Affairs Canada and Canada's network of missions abroad, are involved in the consultation process.

When determining if an application has been processed within the allotted service standard, the Department takes into consideration whether the application has been submitted with all the required documentation. The processing time calculation only begins the moment a complete application has been received and no further clarification or supporting documents are required from the exporter. Please note that applications that are withdrawn, returned without action, or denied are also counted towards the service standard. The data below, which is accurate as of March 9, 2020, captures export permit applications that were submitted in 2019. However, it does not include those applications that were submitted in 2019 but that had not been fully processed as of March 9, 2020.

More information on service standards can be found in the [Export and Brokering Controls Handbook](#).

**Table 14: Export Permit Applications Processed (2019-2017)¹⁹**

	2019	2018	2017
Expedited Assessment Process	3267	3709	3392
Comprehensive Assessment Process	2254	2829	3241
Total	5521	6538	6633

Table 15: 2019 - Global Affairs Canada Service Standards for all Military, Dual-use and Strategic Export Permit Applications

Applications Category and Service Standard	Number of Applications Meeting Service Standard	Number of Applications Not Meeting the Service Standard	Percentage of Applications Meeting Service Standard
Expedited Assessment Process <10 days	2293	974	70.19%
Comprehensive Assessment Process <40 days	1659	595	73.60%
Combined Total	3952	1569	71.58%

6. Annexes

Annex A: Canada's Area Control List (ACL)

The export or transfer of any goods or technology (including technical data, technical assistance and information necessary for the development, production or use of a good) to countries on the ACL is controlled and must be authorized by an export permit issued by the Minister of Foreign Affairs under the authority of the EIPA. Export permits are normally issued only for those goods and technology that respond to humanitarian needs or circumstances, or for the personal belongings of an individual relocating to a country listed on the ACL.

As of December 31, 2019, the ACL was comprised of one country: the Democratic People's Republic of Korea (North Korea), which was added on July 13, 2010.

Guidance on exports to countries listed on the ACL is published in the following Notice to Exporters, which is available at: <http://www.international.gc.ca/controls-controles/systems-systemes/excol-ceed/notices-avis/172.aspx?lang=eng>

¹⁹ The number of applications reported in Table 14 and 15 does not only include items in Group 2 of the ECL but also processed applications (including permit amendment requests) for all Military, Dual-use and Strategic goods and technology.



Annex B: Canada's Automatic Firearms Country Control List (AFCCL)

Further to sections 4.1 and 7(2) of the EIPA, certain prohibited firearms, weapons, or devices, and components and parts thereof, that are included on the Export Control List, may be exported only to destinations on the AFCCL and only to consignees that are government or authorized by government. These must be approved by an export permit issued by the Minister of Foreign Affairs under the authority of the EIPA.

The following goods and their components and parts, as defined in section 4.1 of the EIPA and section 84 of the *Criminal Code*, are subject to the AFCCL, when these items are also included on the Export Control List:

- an automatic firearm, whether or not it has been altered to discharge only one projectile with one pressure of the trigger;
- any firearm that is prescribed by regulation to be a prohibited firearm;
- any weapon, other than a firearm, that is prescribed by regulation to be a prohibited weapon;
- any component or part of a weapon, or any accessory for use with a weapon, that is prescribed by regulation to be a prohibited device;
- a cartridge magazine that is prescribed by regulation to be a prohibited device.

At the time of publication, the AFCCL was comprised of the following countries:

- | | |
|-------------------|--------------------------|
| 1. Albania | 21. Lithuania |
| 2. Australia | 22. Luxembourg |
| 3. Belgium | 23. Netherlands |
| 4. Botswana | 24. New Zealand |
| 5. Bulgaria | 25. Norway |
| 6. Chile | 26. Peru |
| 7. Croatia | 27. Poland |
| 8. Czech Republic | 28. Portugal |
| 9. Denmark | 29. Republic of Colombia |
| 10. Estonia | 30. Republic of Korea |
| 11. Finland | 31. Romania |
| 12. France | 32. Saudi Arabia |
| 13. Germany | 33. Slovakia |
| 14. Greece | 34. Slovenia |
| 15. Hungary | 35. Spain |
| 16. Iceland | 36. Sweden |
| 17. Israel | 37. Turkey |
| 18. Italy | 38. United Kingdom |
| 19. Kuwait | 39. United States |
| 20. Latvia | 40. Ukraine |

The AFCCL can be found at <http://laws-lois.justice.gc.ca/eng/regulations/SOR-91-575/FullText.html>



Annex C: Canada's International Transfers (Government to Government Transfers)

From time to time, the Government of Canada, normally via the Department of National Defence, will provide surplus military equipment to foreign governments through sale or donation. When determining sales and donations to foreign governments, the Government of Canada considers a number of factors, including the nature of the goods, the country of origin, the ATT export assessment criteria, the applicable controls relating to its distribution and the applicable Government of Canada policies. Records pertaining to these types of transfers are kept by the Department of National Defence. As the Department of National Defence is not subject to the EIPA, no permits are required for these exports.

Information on government-to-government transfers of full-system conventional arms is also publicly reported in Canada's submission to the United Nations Register of Conventional Arms (UNROCA) and will also be included in Canada's reports to the ATT Secretariat. There were no transfers of full-system conventional arms in 2019.

Canada's international government-to-government transfers in 2019 were:

- Germany: 1 x 504 Radar system to the German Air Force
- Germany: spare parts for the Leopard tank 1CS to the German Ministry of Defence
- Chile: 1 x STIR Radar system to the Chilean Navy
- Latvia: spare parts for the M109 howitzer to the Latvian Ministry of Defence

More information on the sale and donation of surplus equipment is available at www.forces.gc.ca/en/business-acquire-surplus-equipment/index.page

Annex D: United Nations Register of Conventional Arms (UNROCA)

Canada continues to actively promote greater transparency in the trade of conventional arms. In 1991, Canada was a founding contributor to UNROCA, which is an international, voluntary transparency mechanism under which Member States of the United Nations supply information to the Register on imports and exports of seven categories of conventional arms.

The Register is updated annually and makes a significant contribution to transparency, confidence-building and enhanced global security. Since the inception of the Register, more than 90 countries on average have made annual submissions to it; of these, about 70 have done so consistently, including Canada. As a result, the Register has become an important and authoritative source of information. The Register tracks data on the following seven categories of conventional arms: battle tanks, armoured combat vehicles, large-calibre artillery systems, combat aircraft, attack helicopters, warships, and missiles and missile launchers. These same categories have been incorporated into the ECL through the creation of Group 9, which will facilitate reporting on exports of these items to both UNROCA and the ATT Secretariat.

Canada is also one of a growing number of countries that voluntarily submit data to the Register on military holdings and on procurement through national production. In addition, Canada is one of several Member States that voluntarily supplies information on imports and exports of Small Arms and Light Weapons (SALW) to the Register as part of their annual report. This information goes beyond the voluntary minimum currently recommended by the UN.

Further information on the United Nations Register of Conventional Arms is available online at: www.un.org/disarmament/convarms/register/



Actual Exports from Canada of Conventional Arms and SALW in 2019

The following table represents actual exports of conventional arms and SALW as defined by UNROCA reporting best practices, from Canada, during the 2019 calendar year, against export permits issued by Global Affairs Canada, for military, security or police end-use in the destination country.

Editions of the Report on the Exports of Military Goods from Canada and reports to UNROCA prior to 2016 listed total quantities of conventional arms and SALW that were authorized for export under permits issued in the course of the reporting year. This practice (i.e., reporting the “maximum allowable exports under issued permits”) was not optimal, as it does not allow for the tracking of actual, versus potential, transfers of conventional arms and SALW. Since 2016, Canada reports actual exports/transfers of reportable conventional arms and SALW that occurred during the reporting year.

Table 16 continues to reference Group 2 as Group 9 only came into effect on September 1, 2019 and most 2019 exports of UNROCA items occurred against permits issued prior to September 1. Future editions of this report will include information on the quantity of Group 9 exports to all destinations.

Table 16: 2019 – UNROCA: Actual Exports from Canada of Conventional Arms and SALW

	Conventional Weapons		Small Arms ⁽¹⁾					Light Weapons	
	II	III						I	II
Destination	ACV	LCAs	Pistols	Rifles & Carbines	Assault Rifles	LMGs	Other	HMGs	HH/UB GLs
ECL Item ⁽²⁾	2-6	2-2	2-1	2-1	2-1	2-1	2-2	2-2	2-2
Belgium	9								
Botswana			120						
Israel				90					
Malaysia				3					
Saudi Arabia	183	31		635				152	
United States	48						5 ⁽³⁾		
Total	240	31	120	728			5	152	

ACV: Armoured Combat Vehicle (full systems only)

LCAs: Large-Calibre Artillery Systems (guns, howitzers, and artillery pieces with a calibre of 75 mm and above).

LMG: Light Machine Gun (full automatic firearm up to 12.7 mm / .50 calibre)

HMG: Heavy Machine Gun (full automatic firearm over 12.7 mm / .50 calibre)

HH/UB GL: Hand-Held/Under-Barrel Grenade Launcher

NOTES:

1. All bolt-action and semi-automatic rifles are reported under “Rifles & Carbines”. Full-automatic firearms that are not submachine guns and that do not fall into the Light Machine Gun or Heavy Machine Gun category are reported under “Assault Rifles”.
2. For illustrative examples of ECL items listed under Group 2 (Munitions List) see Table 10. Please note that as only full systems are reported to UNROCA, the values presented in Annex G (which reports all exports, including parts and components) may not correspond to the unit items exported, as reported in this chart.
3. Firearms designed for riot control that discharge 37mm non-lethal rounds.



Annex E: International Cooperation on Military Trade

The major multilateral export control and non-proliferation regimes in which Canada participates are described below. Participating governments negotiate common control lists of goods and technology that are implemented by all, in accordance with national legislation. Each participating government makes its own licensing decisions in accordance with applicable domestic law. These lists evolve in response to changing international and technological circumstances. Updates and amendments are made on a periodic basis. Changes to Canada's Export Control List are incorporated through a regulatory amendment process.

Wassenaar Arrangement - Export Control List Groups 1 and 2

Most items have been included on the ECL because of Canada's commitments to international partners that participate in multilateral export control regimes or because of Canada's obligations as a signatory to international agreements that seek to control and monitor the movement of sensitive goods and technology.

The control regime that deals with the military and dual-use goods and technology covered in Group 1 (Dual-Use List) and Group 2 (Munitions List) of the ECL is the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies, founded in 1996. The Wassenaar Arrangement defines its objectives as:

“to contribute to regional and international security and stability, by promoting transparency and greater responsibility in transfers of conventional arms and dual-use goods and technologies, thus preventing destabilising accumulations.”

Through national policies, the Participating States seek to ensure that transfers of items covered by the common control lists do not contribute to the development or enhancement of military capabilities that have the potential to undermine regional and global security and stability. Participating States also commit to take every precaution to ensure that such goods and technology are not diverted to illegitimate end-uses.

More information about the Wassenaar Arrangement and its 42 Participating States is available at www.wassenaar.org

Nuclear Suppliers Group - Export Control List Groups 3 and 4

Canada has a long-standing nuclear non-proliferation policy that is designed, among other objectives, to ensure that Canada's nuclear exports are not used for any nuclear weapon purposes or their development. As a party to the Treaty on the Non-Proliferation of Nuclear Weapons that came into force in 1970, Canada will not provide source or special fissionable material or equipment or material especially designed or prepared for the processing, use or production, of special fissionable material, to any Non-Nuclear Weapon State for peaceful purposes, unless the source or special fissionable material is subject to International Atomic Energy Agency safeguards.

In the late 1970s, a group of nuclear supplier countries, including Canada, agreed on a set of guidelines for nuclear transfers to any Non-Nuclear Weapon State for peaceful purposes. These became known as the Nuclear Suppliers Group Guidelines. In 1992, the Nuclear Suppliers Group established a list of nuclear-related dual-use goods and technology that could make a major contribution to a nuclear explosive activity or a non-safeguarded nuclear fuel cycle activity.



ECL Group 3 includes items that are nuclear-specific. ECL Group 4 includes nuclear-related dual-use items, i.e. items that are used in non-nuclear applications but that could also be used in a nuclear explosive activity or a non-safeguarded nuclear fuel cycle activity.

More information about the Nuclear Suppliers Group and its 47 Members is available at www.nuclearsuppliersgroup.org

Missile Technology Control Regime - Export Control List Group 6

The Missile Technology Control Regime was established in 1987 to address concerns about the proliferation of systems capable of delivering weapons of mass destruction, namely, chemical, biological or nuclear weapons. ECL Group 6 includes items agreed upon by the Partners of the Missile Technology Control Regime that are used in, or could be used in, the proliferation of systems capable of delivering chemical, biological or nuclear weapons.

More information about the Missile Technology Control Regime and its 35 Members is available at www.mtcr.info

Australia Group - Export Control List Group 7

The Australia Group was established in 1985 with the objective of preventing the proliferation of chemical and biological weapons. The participants (national governments) in the Australia Group have developed common export controls on chemical substances and biological agents and related items that could be used in the production of chemical and biological weapons.

More information about the Australia Group, including its 43 Members, is available at www.australiagroup.org

Organization for the Prohibition of Chemical Weapons - Export Control List Group 7

The Organization for the Prohibition of Chemical Weapons was established in 1997 when the Chemical Weapons Convention came into force. The goal of the Member States is to achieve a world that is free of chemical weapons and of the threat of their use, and in which cooperation in chemistry for peaceful purposes for all is fostered. The ECL contains chemicals and precursors that are controlled under the Chemical Weapons Convention. Some of the Chemical Weapons Convention chemicals and precursors are also controlled by the Australia Group.

More information about the Organization for the Prohibition of Chemical Weapons and its 193 Member States is available at www.opcw.org

Arms Trade Treaty - Export Control List Group 9

The Arms Trade Treaty (ATT) was adopted by the UN General Assembly in 2013 to establish international norms for the conventional arms trade. Unregulated and irresponsible arms transfers intensify and prolong conflict, lead to regional instability, facilitate human rights abuses on a massive scale, and hinder social and economic development. The ATT promotes responsibility, transparency and accountability in the global arms trade. Canada acceded to the ATT on September 17, 2019.

More information about the Arms Trade Treaty and its 106 States Parties is available at www.un.org/disarmament/convarms/att/



Annex F: Index of Destinations Considered Lower-Risk in 2019

Most export permit applications to the following destinations are considered low-risk and are thus subject to an expedited assessment processes. As previously mentioned, the service standard for applications to these destinations is typically 10 working days, as opposed to 40 working days for all other destinations. *All* export permit applications for military items, regardless of their country of destination, are assessed on a case-by-case basis against the previously mentioned assessment criteria, including the ATT criteria. The countries listed below are also considered low-risk within the context of Canada's brokering controls. Controlled transactions brokered to any of these destinations are covered under *General Brokering Permit No. 1*.

- | | | |
|------------------|---------------|---------------------|
| • Australia | • Iceland | • Portugal |
| • Austria | • Ireland | • Republic of Korea |
| • Belgium | • Italy | • Slovakia |
| • Czech Republic | • Japan | • Slovenia |
| • Denmark | • Latvia | • Spain |
| • Estonia | • Lithuania | • Sweden |
| • Finland | • Luxembourg | • Switzerland |
| • France | • Netherlands | • United Kingdom |
| • Germany | • New Zealand | • United States |
| • Greece | • Norway | |
| • Hungary | • Poland | |

Annex G: 2019 Exports of Military Goods and Technology by Destination and ECL Item

Destination	ECL Number	Value
Afghanistan	2-6	\$790.08
Algeria	2-1	\$15,835,615.36
	2-2	\$15,835,615.36
	2-5	\$15,835,615.36
	2-14	\$156,797.23
	2-15	\$919,453.33
	2-18	\$237,755.69
Argentina	2-1	\$12,802.00
Armenia	2-1	\$1,453.20
Australia	2-1	\$13,897,689.10
	2-3	\$84,269.95
	2-4	\$24,000.00
	2-5	\$2,224,415.36
	2-6	\$2,610,722.15
	2-7	\$2,505,121.93
	2-9	\$7,177,552.98
	2-10	\$28,440,415.51
	2-11	\$2,046,663.64
	2-13	\$1,596,805.31
	2-14	\$2,496,340.78
	2-15	\$3,699,148.28
	2-16	\$116,686.14
	2-17	\$47,500.00
	2-18	\$1,429,174.10
	2-21	\$31,662.24
	2-22	\$598,458.55
Austria	2-1	\$80,447.76
	2-5	\$742,961.65
	2-10	\$147,114.41
	2-15	\$733,661.65
	2-21	\$361.00
	2-22	\$121,650.08
Belarus	2-1	\$605.36
Belgium	2-1	\$323,798.45



	2-2	\$810,000.00
	2-3	\$192,720.10
	2-5	\$1,411,584.59
	2-6	\$148,426,637.24
	2-9	\$4,832.00
	2-10	\$309,458.93
	2-11	\$375,023.33
	2-15	\$1,278.68
	2-16	\$53,611.75
	2-17	\$299,301.50
	2-18	\$19,794.10
	2-21	\$200,000.00
	2-22	\$40,000.00
Botswana	2-1	\$973,345.52
	2-10	\$15,017.38
	2-18	\$4,926.78
	2-22	\$251,370.00
Brazil	2-15	\$372,029.12
	2-17	\$337,827.99
	2-22	\$360.00
Brunei Darussalam	2-14	\$3,569.72
	2-21	\$0.11
	2-22	\$0.06
Bulgaria	2-1	\$7,750.00
	2-11	\$188,010.45
	2-21	\$18,879.00
	2-22	\$244,453.30
Chile	2-1	\$39.99
	2-5	\$146,500.00
	2-9	\$2,700,289.85
	2-11	\$59,823.00
	2-14	\$2,701,659.85
	2-21	\$1,370.00
	2-22	\$2,970.53
China	2-22	\$250.00
Croatia	2-1	\$1,900.00
Cuba	2-1	\$129.99
Cyprus	2-11	\$24,500.00
	2-21	\$720.00
	2-22	\$720.00
Czech Republic	2-1	\$214,085.23
	2-3	\$742.50



	2-4	\$9,615.00
	2-10	\$15,484.24
	2-11	\$184,314.78
Denmark	2-1	\$1,939,565.23
	2-6	\$7,437.00
	2-10	\$919,029.00
	2-11	\$280,237.25
	2-13	\$6,910.00
	2-18	\$32,229.17
	2-21	\$72,300.00
	2-22	\$800.00
Egypt	2-15	\$118,713.42
Finland	2-1	\$57,843.00
	2-3	\$420.00
	2-5	\$85,875.00
	2-6	\$620,750.00
	2-10	\$248,146.29
	2-11	\$50,300.00
	2-15	\$2,933,738.76
	2-22	\$1,000.00
France	2-1	\$462,384.78
	2-3	\$673,533.34
	2-4	\$260,467.00
	2-5	\$1,513,543.77
	2-6	\$781,574.50
	2-9	\$184,500.00
	2-10	\$1,274,144.47
	2-11	\$543,725.12
	2-14	\$178,207.97
	2-15	\$13,766,859.19
	2-17	\$1,273,480.00
	2-18	\$24,221.34
	2-21	\$178,624.54
	2-22	\$95,666.91
French Polynesia	2-1	\$619.97
Gambia	2-2	\$130,092.00
	2-3	\$67,000.00
Georgia	2-1	\$1,063.99
Germany	2-1	\$1,750,877.11
	2-4	\$915,696.71
	2-5	\$4,040,009.99
	2-6	\$3,687,802.89



	2-9	\$1,785,776.69
	2-10	\$3,069,719.85
	2-11	\$12,086,002.08
	2-13	\$7,398.58
	2-14	\$1,162,868.59
	2-15	\$1,865,321.33
	2-16	\$1,154,045.77
	2-17	\$337,288.00
	2-18	\$99,114.19
	2-21	\$15,417,667.26
	2-22	\$68,094.12
Greece	2-1	\$1,500.00
	2-5	\$13,889.00
	2-10	\$1,175,000.00
Haiti	2-1	\$539.00
	2-3	\$200.00
Hong Kong	2-11	\$10,848.71
	2-22	\$1,325.60
Hungary	2-1	\$36,443.39
	2-3	\$7,200.00
	2-7	\$10,398.56
	2-10	\$51,876.91
Iceland	2-1	\$5,718.00
India	2-1	\$19,635.00
	2-3	\$300.00
	2-9	\$399,878.00
	2-10	\$79,304.06
	2-11	\$260,858.38
	2-13	\$1,189.54
	2-15	\$22,470.00
	2-21	\$100.06
	2-22	\$1,039,992.83
Indonesia	2-14	\$865,000.00
	2-15	\$599,357.41
	2-21	\$1,274,000.03
	2-22	\$3.00
Ireland	2-1	\$19,891.00
	2-2	\$29,337.50
	2-11	\$2,637.20
	2-15	\$55,709.22
Israel	2-1	\$1,652,874.75
	2-4	\$1,294,647.96



	2-5	\$952,782.39
	2-6	\$121,590.47
	2-10	\$3,157,570.53
	2-11	\$5,973,545.84
	2-14	\$10,007.48
	2-15	\$307,252.27
	2-16	\$286,399.68
	2-18	\$1,148.50
	2-21	\$755.00
	2-22	\$3,911.00
Italy	2-1	\$3,413,862.60
	2-3	\$2,097,420.00
	2-5	\$255,923.31
	2-7	\$7,716.99
	2-8	\$2,050.17
	2-9	\$9,024,587.43
	2-10	\$1,860,915.32
	2-11	\$54,105.99
	2-14	\$78,900.00
	2-15	\$475,744.80
	2-16	\$391,306.72
	2-17	\$3,144,912.36
	2-18	\$10,030.00
	2-21	\$14,703.66
	2-22	\$20,935.23
Japan	2-1	\$6,033.00
	2-4	\$281,022.00
	2-5	\$69,238.26
	2-6	\$7,500.00
	2-7	\$42,164.16
	2-9	\$1,073,218.43
	2-10	\$11,021,257.65
	2-11	\$19,911,086.10
	2-15	\$178,234.23
	2-16	\$1,917,748.00
	2-18	\$60,874.60
	2-21	\$1,518,500.00
	2-22	\$20,578.15
Jersey	2-1	\$1,805.48
Jordan	2-15	\$45,638.77
Kazakhstan	2-1	\$2,900.82
Kenya	2-1	\$34,800.00



	2-10	\$10,000.00
	2-15	\$2,583.31
Korea (South), Republic of	2-1	\$117,176.50
	2-5	\$484,736.00
	2-6	\$1,234,831.23
	2-9	\$7,140,194.46
	2-10	\$1,071,381.43
	2-11	\$1,931,246.15
	2-14	\$201.00
	2-15	\$980,569.19
	2-17	\$4,150,265.98
	2-18	\$1,482.07
	2-21	\$376,798.24
	2-22	\$2,636,972.86
Kuwait	2-3	\$446,000.00
	2-10	\$11,681.48
Latvia	2-11	\$170,238.00
	2-15	\$1,207,983.00
Lithuania	2-1	\$26,710.00
	2-13	\$585.94
Luxembourg	2-5	\$63,402.43
	2-6	\$100,089.16
	2-9	\$783,004.00
	2-10	\$5,256.58
	2-14	\$1,344,640.14
	2-15	\$655,762.94
	2-16	\$86,441.50
	2-18	\$534,323.87
	2-21	\$33,325.10
Malaysia	2-1	\$31,554.00
	2-10	\$37,982.00
	2-11	\$4,280.00
Malta	2-11	\$24,300.00
	2-21	\$180.00
	2-22	\$180.00
Mexico	2-1	\$159.98
	2-10	\$70,587.11
	2-11	\$4,380.00
	2-15	\$1,442,660.78
	2-22	\$2.70
Mongolia	2-1	\$399.99
Morocco	2-3	\$2.91



	2-10	\$338,032.42
	2-14	\$14,331.72
Netherlands	2-1	\$6,670,209.36
	2-4	\$39,508.91
	2-5	\$451,170.00
	2-7	\$1,350.14
	2-9	\$200,475.00
	2-10	\$4,744,244.97
	2-11	\$543,502.06
	2-14	\$4,366,290.02
	2-15	\$800.00
	2-16	\$399,114.31
	2-18	\$47,428.00
	2-21	\$2,691,592.69
	2-22	\$4,179,702.69
New Caledonia	2-1	\$1,466.95
New Zealand	2-1	\$515,589.91
	2-2	\$89,151.65
	2-3	\$0.70
	2-5	\$1,057,694.78
	2-6	\$582,282.95
	2-9	\$17,926.53
	2-10	\$1,638,700.40
	2-11	\$607,170.95
	2-21	\$1.00
	2-22	\$1,610.17
Niger	2-15	\$12,813.86
Nigeria	2-10	\$1,605,548.91
Norway	2-1	\$1,136,124.93
	2-3	\$724.41
	2-5	\$416,046.00
	2-6	\$54,980.00
	2-8	\$24.44
	2-9	\$2,590,674.18
	2-10	\$1,139,250.00
	2-11	\$46,813.77
	2-14	\$9,875.00
	2-15	\$1,959,403.72
	2-18	\$2,884.30
	2-21	\$15,279.71
	2-22	\$610.01
Oman	2-14	\$1,320.00



Peru	2-1	\$395,261.87
	2-4	\$206,438.62
	2-5	\$206,438.62
	2-6	\$601,700.49
	2-7	\$601,700.49
	2-11	\$734,960.49
	2-13	\$601,700.49
	2-18	\$601,700.49
Philippines	2-1	\$458.00
Poland	2-1	\$188,364.85
	2-2	\$4,400.00
	2-5	\$8,310.00
	2-6	\$54,758.95
	2-7	\$50,030.46
	2-10	\$5,890,296.58
	2-11	\$83,600.54
	2-18	\$23,433.22
	2-22	\$196,339.55
Portugal	2-1	\$450.00
	2-3	\$70.00
	2-4	\$2,040.00
	2-7	\$3,454.90
	2-10	\$43,698.25
Qatar	2-5	\$5,250,000.00
	2-6	\$14,820,000.00
	2-10	\$21,794.09
	2-21	\$3,900,000.00
Romania	2-1	\$5,459.71
	2-4	\$118,306.39
	2-11	\$161,878.02
	2-21	\$107,122.00
	2-22	\$106,500.00
Russian Federation	2-1	\$2,193.94
Saudi Arabia	2-1	\$6,030,497.63
	2-2	\$75,218,466.58
	2-4	\$1,006,750.65
	2-5	\$13,901,527.00
	2-6	\$2,812,196,802.89
	2-11	\$17,069,023.94
	2-13	\$17,838,077.01
	2-14	\$28,545,170.04
	2-15	\$1,177,552.93



	2-18	\$7,858,553.03
	2-21	\$2,941,796.36
	2-22	\$5,310.65
Singapore	2-1	\$22,160.00
	2-6	\$21,956,792.40
	2-8	\$519,603.90
	2-9	\$359,776.87
	2-10	\$379,847.68
	2-14	\$12,749,367.04
	2-18	\$46,468.00
	2-21	\$1,344,690.44
	2-22	\$2,974,220.04
Slovakia	2-1	\$7,065.00
Slovenia	2-1	\$201,013.00
South Africa	2-1	\$301,374.69
	2-3	\$2,763.33
	2-5	\$10,355.00
	2-11	\$1,538,051.08
	2-21	\$6,248.26
Spain	2-1	\$91,257.00
	2-3	\$0.70
	2-5	\$630,700.80
	2-6	\$2,138,265.07
	2-7	\$42,000.00
	2-9	\$134,978.29
	2-10	\$240,503.94
	2-11	\$1,436,589.43
	2-14	\$11,967,084.71
	2-15	\$2,521,359.87
	2-17	\$601,354.00
	2-18	\$1,137,883.76
	2-21	\$2,031,057.18
	2-22	\$1,770,703.21
Sweden	2-1	\$177,486.08
	2-3	\$126,000.00
	2-5	\$16,379.00
	2-6	\$5,391,950.00
	2-7	\$3,413.40
	2-9	\$61,600.00
	2-10	\$15,572,497.74
	2-11	\$653,076.25
	2-14	\$452,721.05



	2-21	\$212,872.68
	2-22	\$2,666.00
Switzerland	2-1	\$68,795.00
	2-3	\$274,000.00
	2-5	\$2,510,016.60
	2-6	\$1,136,138.61
	2-7	\$15,600.00
	2-10	\$1,170,771.34
	2-11	\$1,158,342.42
	2-13	\$3,560.57
	2-15	\$145,761.78
	2-18	\$924,622.53
	2-21	\$3,250.00
	2-22	\$1,087,623.03
Taiwan	2-1	\$11,470.00
	2-3	\$240.00
	2-8	\$5,209,540.20
	2-10	\$110,081.91
	2-11	\$703,133.84
	2-15	\$222,369.39
	2-21	\$360.00
	2-22	\$11,484,484.20
Thailand	2-1	\$5,995.19
	2-4	\$39,250.50
	2-6	\$60,722.00
	2-10	\$2,280,741.21
	2-13	\$5,342.40
	2-21	\$0.30
	2-22	\$1.00
Turkey	2-1	\$1,995,150.00
	2-4	\$31,924.80
	2-5	\$59,831,034.01
	2-6	\$345,462.09
	2-9	\$19,000.00
	2-10	\$2,101,040.96
	2-11	\$19,636,100.24
	2-14	\$571,309.54
	2-15	\$116,046,883.17
	2-17	\$309,867.78
	2-21	\$628,085.58
	2-22	\$2,001,919.71
Turks and Caicos Islands	2-3	\$712.40



Ukraine	2-1	\$828,002.69
	2-3	\$65,826.18
	2-15	\$1,425,000.00
	2-21	\$360.00
	2-22	\$67,302.00
United Arab Emirates	2-1	\$55,240.00
	2-3	\$10,896,040.00
	2-10	\$393,166.84
	2-11	\$115,358.00
	2-14	\$5,315,368.53
	2-15	\$2,520,079.86
	2-17	\$122,819.92
	2-18	\$412,883.42
	2-21	\$16,941,438.85
	2-22	\$10,139.06
United Kingdom	2-1	\$1,551,794.02
	2-3	\$49,770.70
	2-4	\$608,771.48
	2-5	\$3,379,807.00
	2-6	\$677,776.85
	2-9	\$15,676,017.93
	2-10	\$18,868,805.33
	2-11	\$5,211,553.54
	2-13	\$22,577.60
	2-14	\$21,849,095.09
	2-15	\$8,506,223.64
	2-16	\$432,472.33
	2-17	\$130,597.44
	2-18	\$481,657.01
	2-21	\$21,749,119.71
	2-22	\$20,010,932.02
Uzbekistan	2-6	\$616,000.00
Vietnam	2-1	\$9,840.00
	2-15	\$300,846.00