Government of Flanders

SUMMARY

ANNUAL ARMS TRADE REPORT 2025

Strategic Goods Control Unit

FLANDERS
CHANCELLERY &
FOREIGN OFFICE

SUMMARY

ANNUAL ARMS TRADE REPORT 2025

Strategic Goods Control Unit

Summary of the 22nd Annual Report of the Government of Flanders to the Flemish Parliament on the exemptions granted and the licences granted and denied for the import, export, transit and transfer of defence-related products, other materials for military use, law enforcement equipment, civilian firearms, components and ammunition.

Table of contents

1

Legal and administrative framework

1.1. The Arms Trade Decree and the Arms Trade Order

In the Flemish Region, powers relating to the arms trade are largely exercised by virtue of the Arms Trade Decree of 15 June 2012 and the Arms Trade Order of 20 July 2012, which were revised in 2017.

In the 2024–2029 Flemish Coalition Agreement, the Government of Flanders commits to **updating this regulatory framework**, in light of the changed geopolitical context.

1.2. General restrictive measure on military goods for Israel

On 2 September 2025, the Government of Flanders determined its position on the conflict in Israel and Gaza. In doing so, it reaffirmed the **very strict policy that the Flemish Region has been applying since 2009** for the transfer, export and transit of military goods to Israel: licences shall not be granted if strategic goods (within the scope of the Arms Trade Decree and European Regulation 2021/821) strengthen Israel's defence capabilities or are intended for military use in or by Israel.

On 15 October 2025, the Government of Flanders adopted an **additional measure** pursuant to Article 43/1 of the Arms Trade Decree. The Government of Flanders automatically and systematically denies licence applications **where the end use is in Israel, without assessing each application individually against the criteria**. In principle, this measure applies for six months, but it may be extended for as long as the situation in Gaza requires.

1.3. European legislation

Directive (EU) 2021/555 of the European Parliament and of the Council of 24 March 2021 lays down, among other things, the rules governing the **transfer of firearms for civilian use, components and ammunition** within the European Union, Norway, Iceland, Liechtenstein and Switzerland.

The Council Common Position 2008/944/CFSP of 8 December 2008 defines common rules governing **control of exports of military technology and equipment**. It sets out the criteria against which EU Member States must assess export licence applications for items on the **EU Common Military List**.

In **April 2025**, the Common Position **was thoroughly amended** (Council Decision (CFSP) 2025/779 of 14 April 2025). The amended Position places greater emphasis on human rights and international humanitarian law.

Directive 2009/43/EC of the European Parliament and of the Council of 6 May 2009 lays down the terms and conditions of **transfers of defence-related products** within the European Union, Norway and Iceland. These rules have also been **transposed into the Arms Trade Decree and the Arms Trade Order**. They constitute the basis for the use of **general, global and individual transfer licences**, among other things.

The Firearms Regulation, or Regulation (EU) No 258/2012 of the European Parliament and of the Council of 14 March 2012, implements Article 10 of the United Nations' Protocol for firearms, which supplements the United Nations Convention **against Transnational Organised Crime**.

1.4. The international framework: UN Arms Trade Treaty

The UN Arms Trade Treaty regulates the international trade in conventional arms. It is a historic treaty, as it contains the **first global, legally binding rules on the international arms trade**. On 31 December 2025, the UN Arms Trade Treaty had 118 States Parties.

1.5. Strategic Goods Control Unit

The Strategic Goods Control Unit (SGCU) of the Flanders Chancellery and Foreign Office monitors the import, export, transit and transfer of strategic goods. It also **partially monitors compliance** with the Arms Trade Decree and can take action in the event of breaches.

In addition, the **SGCU provides information and raises the awareness** of export controls in Flanders' industry and research community. In doing so, the Unit supports the competitiveness of Flanders and Europe and prevents strategic goods or knowledge from being used for undesirable purposes. It also ensures transparency through reports to the Parliament, the EU and international partners.

The SGCU also plays an active role in **strengthening and harmonising export controls in Europe and around the world**. Flemish experts participate in multilateral export control regimes, share their expertise with other countries and contribute to European working groups. The SGCU defends Flanders' interests and is committed to ensuring a level playing field in Europe.

2

Strategic goods control in a changing security context

2.1. Growth and technological innovation

In 2025, the geopolitical context became more complex and growing attention was paid to security and defence in Europe and Flanders. With the **Flemish Defence Plan**, presented in April 2025, the Government of Flanders seeks to strengthen the defence industry technologically and economically.

These developments led to **an increase in licence applications** for strategic goods. Due to the rising number of applications as well as their growing complexity, the Strategic Goods Control Unit (SGCU) expanded its staff in 2025.

2.2. Strengthening strategic goods controls

Another reason for broadening the scope of SGCU's operations is the Government of Flanders' policy decision to strengthen strategic goods controls, that is to say, **speeding up controls where possible and monitoring them where necessary**.

In 2025, additional attention was paid to providing better guidance to companies, building greater expertise, simplifying procedures and strengthening enforcement policy.

2.3. Outreach, knowledge building and collaboration

In 2025, the SGCU held 39 individual meetings with companies, partly to support them in developing an **internal compliance programme** (ICP) and in **accurately classifying** their products.

In addition, the Unit attended **international defence shows**, such as the Paris Air Show and DSEI in London. In doing so, it kept a close eye on technological and market developments and gained a better understanding of international value chains and the position of Flemish companies. Its attendance also raised the Unit's profile and made them more accessible to companies.

During the mission to London, the SGCU held a seminar for Flemish companies. In addition, several **training sessions** were organised in 2025, including three basic sessions aimed at companies participating in European initiatives, among other target groups. The Unit's staff also took part in **European programmes**.

2.4. Simplified procedures and more efficient operations

In line with the Flemish Defence Plan, the SGCU worked on **simplified and more efficient procedures** with shorter lead times and reduced administrative burdens. Together with the Inter-University Centre for Legislation, it carried out a **regulatory impact assessment**.

An initial set of measures concerned the digitalisation of **end-user certificates**. In this regard, the SGCU applies a **risk-based approach**, whereby the procedure is tailored to the risk associated with the transaction.

The Unit also encouraged companies to make more frequent use of **global and combined licences** for low-risk transactions. This reduces the administrative burden on both companies and the government.

Moreover, the procedure for **prior authorisations** was fine-tuned, with screenings and advisory opinions that better match the **application profile**.

3

International Outlook 2025

3.1. Global arms trade

Although many countries do not publish their import and export figures, several reports do provide some indication.

Within the **United Nations**, States agreed to report on their conventional arms trade. The reports submitted are publicly available on UNROCA's website. For the 2024 reporting year, 67 UN Member States submitted a report.

States Parties to the **UN Arms Trade Treaty** (ATT) must report annually on their **import, export and transit of conventional weapons**. Most ATT reports are publicly available on the UN Arms Trade Treaty website.

The eleventh **conference** of States Parties to the UN Arms Trade Treaty (CSP11) took place **in Geneva from 25 through 29 August 2025**. The final report of the conference sets out all the decisions and recommendations. The documents and contributions submitted by countries, including Belgium, are also publicly available on the UN Arms Trade Treaty website.

A broader and more consistent picture of global military expenditure is available from the **Stockholm International Peace Research Institute** (SIPRI). The Flemish Peace Institute published a Dutch-language summary of the SIPRI Yearbook 2025 on its website.

3.2. European arms trade

EU Member States must report annually on their **exports of military equipment**. This is set out in Common Position 2008/944/CFSP.

The EU's Twenty-Seventh Annual Report on European arms exports in 2024 was published in the Official Journal of the European Union on 22 April 2026. A total of 31,444 licences were registered for a total value of € 316,605,812,202. 104 licences were denied.

All data has been broken down into **22 categories of military equipment**.

3.3. International arms embargoes

Three international organisations impose arms embargoes and other restrictive measures:

- the European Union (EU)
- the United Nations (UN)
- the Organisation for Security and Co-operation in Europe (OSCE)

In 2017, the European Commission developed the EU Sanctions Map. This **website shows**:

- the countries, entities or individuals subject to measures
- the types of measures in force

The European Commission's Service for Foreign Policy Instruments **updates the website daily**.

4

Flemish imports, exports, transits and transfers in 2025

4.1. Permanent imports from non-EU countries

In 2025, **42 licences were granted** for permanent imports from countries outside the EU. In 2024, 54 licences were granted.

The licensed value has risen sharply from € 8,195,922 to **€ 108,458,396**. It almost exclusively concerns the import of firearms and ammunition. Two specific dossiers concerning goods for drones destined for the Belgian Defence were jointly worth around € 100,000,000 in total.

4.2. Permanent exports to non-EU countries

The number of **permanent export licences** granted grew from 63 in 2024 to **78**. The value of exports increased from € 99,975,806 to **€ 263,199,346**.

One possible explanation for this increase is the Strategic Goods Control Unit's outreach work on more flexible licences for specific applicants. The value of these licences usually exceeds that of the individual licences.

In 2025, most exports were made (based on the latest known end users) to the United States, the United Kingdom and Ukraine.

4.3. Transits from and to non-EU countries

In 2025, **eight transit licences were granted**. This is one more than in 2024. However, the licensed value for these transactions rose substantially from € 21,547,844 to **€ 200,989,081**. A number of specific high-value licences account for that increase. The most valuable transit in 2025 alone was a transaction worth almost € 120,000,000.

4.4. Temporary imports and exports from non-EU countries

Just as in 2024, **no temporary import licences** were **granted or denied** in 2025.

The number of **temporary export** licences granted went up slightly from 19 to 22. The value increased almost proportionally from € 57,152,126 to **€ 64,257,052**. These figures are also in line with previous years.

4.5. Permanent transfers from other EU Member States

The number of **licences granted for transfers to the Flemish Region** fell in 2025 compared to the year before. In 2025, **358** licences were granted compared to 382 in 2024. The value, on the other hand, did increase. In 2025, the total value of this type of licences amounted to **€ 36,187,228**, compared to € 25,002,645 in the previous year. There is no specific explanation for this increase. Still, the 2025 figure is in line with the 2023 and 2022 figures, which are € 36,373,875 and € 33,310,684 respectively.

As is the case for imports from non-EU countries, the licences granted for transfers from EU countries to the Flemish Region mainly involve ammunition and ammunition components.

4.6. Permanent transfers to other EU Member States

The number of **individual licences** granted for **transfers from the Flemish Region** to other EU Member States amounted to **139** in 2025, compared to 109 in 2024. The value totalled **€ 102,826,932**, compared to € 13,363,516 in 2024, which is a significant increase. Still, the total value in 2024 was remarkably low. By way of comparison, the total value was € 80,997,874 in 2023. Furthermore, several particularly large transactions were licensed in 2025. The total value of the three most valuable dossiers alone amounted to € 67,000,000.

The values below were reported for **permanent transfers** to other EU Member States carried out in 2025 **based on general licences** and **global licences**.

General licences	2025	2024
Type 1: Armed forces	**3.420.788**	6.896.473
Type 2: Certified individuals	**216.581**	282.262
Type 5: Intergovernmental cooperation programme	**8.580.211**	7.127.069
Global licences	**2.139.032**	644.227
	14.356.612	14.950.032

The most transfers (based on the latest known end users) in 2025 were made to France, Germany, Austria and Sweden.

4.7. Temporary transfers from and to other EU Member States

In 2025, **three licences were granted for temporary transfers from an EU Member State** to Flanders, for a total value of **€ 179,200**.

One licence was granted for temporary transfer from Flanders to another EU Member State, worth € 362,500.

The values below were reported for temporary transfers to other EU Member States carried out **based on general licences**.

		2024
General type 3: Armed forces	**191.148**	619.562
General type 4: Certified individuals	**732.743**	5.589.426

4.8. Extensions, preliminary opinions, written confirmations and indicative information

In 2025, **eight extensions** were granted, each time for exports. **One positive preliminary opinion** was issued. **No written confirmations** were granted. **Four** requests for **indicative information** were made, two of which were approved, one was declared inadmissible and one was withdrawn by the applicant.

4.9. Further analysis

In 2025, **17 dossiers were valued at over € 10,000,000**.

Of all the licences granted, **625 were intended for permanent transactions**.

The **most common ML categories are ML1, ML23 and ML03**. Other common categories are ML06, ML05 and ML22.

Twelve combined licences were granted for a three-year period to several consignees and end users in one non-EU country, for a specified volume of goods. The licences were all granted for destinations in the United States, Canada and the United Kingdom. One dossier had Israel as a destination: a temporary transaction for end use by the Belgian Defence.

Seven global licences were granted for a three-year period for several consignees and end users within the EU.

A total value of € 200,619,117 was allocated to **six individual transit dossiers**.

Eighteen individual licences were issued for **end use in Ukraine**, totalling € 53,182,249.

Three permanent licences were issued with **Israel as the country of destination**. In two of these dossiers, the end use was situated in a third country, namely Switzerland and Argentina. One licence had the embassy of an EU Member State in Israel as end user. The remaining 12 licences that were issued with Israel as the country of destination, were all of a temporary nature, with the goods returning to the Flemish Region.

More than half of the licences were issued for **civilian firearms and ammunition**, namely 468 licences for category ML01 and 83 licences for category ML03.

Fourteen licences were issued for category ML22. This concerns **technology transfers** where the licence **has no monetary value**.

5

Parliamentary oversight

In 2025, 38 written questions and 20 requests for clarification were submitted, which is a significant increase compared to the seven written questions and five requests for clarification in 2024.