



PERMANENT MISSION OF
GREECE TO THE OSCE

ΜΟΝΙΜΗ ΑΝΤΙΠΡΟΣΩΠΕΙΑ
ΤΗΣ ΕΛΛΑΔΑΣ ΣΤΟΝ ΟΑΣΕ

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VERBAL NOTE

The Permanent Mission of Greece to the Organization for the Security and Cooperation in Europe (OSCE) presents its compliments to the Permanent Missions and Delegations of all Participating States to the OSCE and to the Conflict Prevention Centre (CPC) and has the honour to submit herewith the “Questionnaire on Participating States Policy and/or National Practices and Procedures for the Export of Conventional Arms and Related Technologies”, in accordance with FSC.DEC 20/95.

The Permanent Mission of Greece to the Organization for the Security and Cooperation in Europe (OSCE) avails itself of this opportunity to renew to the Permanent Missions and Delegations of all Participating States to the OSCE and the Conflict Prevention Center (CPC) the assurances of its highest consideration.



Vienna, 10 June 2025

To:

- Permanent Missions and Delegations of the Participating States to the OSCE
- The Conflict Prevention Center (CPC)

In Town

Attachments: 19 pages

GREECE

Questionnaire on Participating States' Policy and/or National Practices and Procedures for the Export of Conventional Arms and Related Technologies

1. Their basic principles, policies and/or national practices on the export of conventional arms and related technology.

Implementing policies for dual use and military goods is guided by EU regulations and EU decisions and aims at controlling and regulating the transfer of such goods towards sensitive destinations in order to avoid their diversion.

Following recent legislative changes, the competent authority for issuing a license for export and/or re-export of arms or any other type of military equipment from Greece, is the Ministry of Foreign Affairs/B6 Directorate for Multilateral Economic Relations and Trade Policy. This Directorate issues the relevant licenses following consultations with the Foreign Ministry's regional political desks, the Ministry of National Defense and the Ministry of Citizens' Protection (Public Order) depending on the intended use of the export item (i.e. military or civilian).

Authorizations are granted only in cases where exports serve legitimate purposes, while authorizations are never issued when the consignee is a country where an embargo has been imposed by the UN Security Council or the EU Council. There are some cases, as indicated in points (2) & (7) para. 5 of Article 3 of LAW 4028/11 of November 11th, 2011 (Government Gazette 242A'), where the export license can be issued directly by the Ministry of Defense.

2. Their national legislation governing the export of conventional arms and related technology. If applicable, report changes and/or updates to the data provided in 1995, including any relevant subsidiary legislation.

Applicable legislation, governing the export of conventional arms is based on LAW 2168/93 of September 3rd, 1993 (Government Gazette 147A') which determines matters pertaining to military goods (including SALW), ammunition, explosive devices and substances. The above mentioned law was revised with LAW 3944/11 of April 5th, 2011 (Government Gazette 67A') in order to incorporate EU directive 2008/51/EC of the European Parliament and the EU Council (May 21, 2008) which had amended Council Directive 91/477/EEC on the control of the acquisition and possession of weapons¹. The incorporated provisions include marking and tracing as well as stricter guidelines for record keeping. Furthermore, initial legislation governing arms exports was further amended with LAW 4028/11 of November 11th, 2011 (Government Gazette 242A') in order to incorporate Directive 2009/43/EC of the European Parliament and of the EU Council of May 6th, 2009 simplifying terms and conditions of transfer of defense-related products within the European Community, and the EU Common Position on Brokering 2003/468/CFSP. Furthermore, with LAW 3875/10 of September 20, 2010 (Government Gazette 158A'), Greece ratified the

¹ Directive 91/477/EEC was further updated with EU Directive 853/2017 (17.5.2017), and was subsequently incorporated into national legislation with LAW 4678/2020 (Government Gazette 70A')

United Nations Convention Against Transnational Organized Crime and the Protocols thereto including the Protocol against the Illicit Manufacturing of and Trafficking in Firearms, their Parts and Components and Ammunition, supplementing the United Nations Convention against Transnational Organized Crime. Greece has also ratified the Arms Trade Treaty (ATT), with LAW 4365/2016 of February 12th, 2016 (Government Gazette 16A).

Finally, the relevant documents required for the issuance of a license are indicated in the Ministerial Decision Φ. 900/2553/Σ.751 of February 17, 2012 (Government Gazette B' 746), which has been modified with the Ministerial Decision Φ. 900/02/117469/Σ.19157 of November 2nd, 2022 (Government Gazette B' 5838), while suppliers are required to follow specific guidelines for the secure transport of goods required by article 12 of LAW 4028/2011 and further stipulated in Ministerial Decision Φ. 900/7532/Σ. 2126/2012 of June 11th, 2012 (Government Gazette B' 1830).

3. Any international agreements or guidelines, other than OSCE commitments, covering the export of conventional arms to which they are a party.

Greece, as an EU member state, abides by the eight criteria stipulated in the Common Position CFSP/944/2008 which defines the common rules governing the control of exports of military technology and equipment. Greece, as party to the Arms Trade Treaty since 2016, also applies Article 6 on "Prohibitions" and Article 7 on "Export and Export Assessment" of the said Treaty. Furthermore, as member of the Wassenaar Arrangement, Greece adheres to the strict guidelines indicated by the Arrangement for both military and dual use items.

4. The procedures for processing an application to export conventional arms and related technology:

- **Who is the issuing authority?**
- **What other authorities are involved and what is their function?**
- **Who deals with compliance?**

Export applications are processed by the Ministry of Foreign Affairs/B6 Directorate for Multilateral Economic Relations and Trade Policy which is the coordinating authority for the issuance of an export license. This Directorate collaborates in this process with the Foreign Ministry's regional political desks and with the competent departments of the Ministry of Defense (for military exports & technology) and the Ministry of Citizens' Protection. Following the assessment of the application, the B6 Directorate for Multilateral Economic Relations and Trade Policy informs the interested exporting party about its export request. Export licenses can be denied in case one of the aforementioned Ministries does not consent to granting an export authorization for reasons it considers important (i.e. the political, military and other circumstances of the region of export or the end-user of the controlled goods).

Furthermore, the authority responsible for issuing an export license has also the capacity to revoke it, in case the situation in the consignee country or in the country's extended area changes.

As a general rule, consultations for approval or rejection of an export license request cannot exceed a 30 day period, while the export license applies for one (1) year with the possibility of extension for another one (1) year, as stipulated in point (3) para.5 of article 3 of LAW 4028/2011.

5. Lists of conventional weaponry under national export controls and the basis for their control. If applicable, report changes and/or updates to the data provided in 1995.

Article 9 of the Ministerial Decree Φ.900/2553/Σ.751 of February 17, 2012 (Government Gazette 746B'), harmonized the national control list in accordance with the requirements set by the EU Council Directive 2009/43/EC, issued on December 14th, 2012, indicating that, from that date onward, the updated EU military list is incorporated into the Greek legal corpus without any additional ministerial decrees.

6. Principles and national regulations on the destination or end-user of the equipment. Is there a complete erga omnes system or a published list of:

- **Destinations of Concern?**
- **Embargoed countries?**
- **Differentiation between destinations (e.g. is there any preferential treatment or (groups) of countries)?**

While there is no published national list of countries of concern, Greek authorities carefully examine the issuance of export licenses on a case-by-case basis and in adherence to the UN and EU sanctions. No preferential treatment is given to any country.

7. Requirements for the provision of an end-user certificate in an export license application, or of non-re-exporting clauses, or of any other type of certification before and after delivery for conventional arms export contracts. If applicable, please specify any verification of the end-user certificate and/or non-re-export clauses before and after delivery.

In order to approve a license for an arms export, an end-user certification is required. The end-user certificate, issued by the competent governmental authority of the importing state, can include restrictive re-export clauses stipulated by the contractual agreement by the two parties. In accordance with Ministerial Decision Φ. 900/2553/Σ.751/ of February 17, 2012 (Government Gazette 746B'), and specifically para. 3 of its Article 4, the exporting state, in this case Greece, can request a "post-shipment control" which would verify the completion of the transaction.

8. National definition of transit and transshipment (including free zones) of conventional arms, together with associated national legislation and compliance procedures.

Transit and transshipment activities fall under the same legislative and compliance procedures as traditional exports (Article 4 of LAW 2168/1993 as revised). The terms, conditions and the procedure for issuing a transit permit, as well as its safe implementation are provided for in the Joint Ministerial Decision 3009/2/21-γ, April 21st 1994 (Government Gazette 301 B').

9. The procedures governing companies wishing to export arms. Are companies obligated to seek official governmental authority to enter into contract negotiations or to sign contracts with foreign customers?

Operating companies based in Greece that manufacture military goods, must meet the guidelines stipulated by the Decision No. Φ.600/311054/Σ. 572 of May 31st, 2005. Companies involved in the production of military goods are not obligated to seek official governmental authorization to enter into contract negotiations. They must, however, be in the export registry for the production of defense related equipment (Presidential Decree No. 3 of January 14th, 2008, Gov. Gazette 3A) as producers associated with the defense sector.

10. Policy on the revocation of export licenses once they have been approved: please list any published regulations.

As indicated in Question 4 above, the authority responsible for the issuance of an export license has also the competency to revoke an approved license, if circumstances in the recipient state require so. Licenses are revoked under specific circumstances, such as the adoption of mandatory sanctions by the UN and the EU. Assessments of the approved licenses are based on the guidelines of national criteria, including the EU Common Position, following changes in the existing situation of the recipient country or following new information relevant to the end-user. Export and re-export licenses are assessed in accordance with point (8) para. 5 of article 3 of LAW 4028/2011 of November 11th, 2011 (Gov. Gazette 242A').

11. The penal and administrative implications for any exporter failing to comply with national controls. If applicable, report changes and/or updates to the data provided in 1995.

The penal and administrative implications for an exporter failing to comply with national controls are stipulated in Article 18 of LAW 2168/1993 of September 3rd, 1993 (Government Gazette 147A'), as amended. Furthermore, article 272 of the Penal Code, as modified by LAW 2928/2001 of June 27th, 2001 (Government Gazette 141A'), applies to explosives and carries heavier fines as well as imprisonment up to 10 years. Additional penalties are indicated in point (10) para. 5 of article 3 and article 19 of LAW 4028/2011 of November 11th, 2011 (Gov. Gazette 242A').

12. Any circumstances in which the export of arms does not require an export license.

All conventional arms' exports require an export license.

13. Licenses for temporary export (e.g. demonstrations or testing), the period allowed and any special conditions attached to the license, including verification of return procedures.

Exports for the purpose of testing and/or demonstration of military goods in third countries are not excluded from the standard licensing procedures. However, such licenses are issued directly by the Ministry of Defense as per points (2) & (7) para. 5 of Article 3 of LAW 4028/11 on November 11th, 2011 (Government Gazette 242A'). In the cases of

common military exercises held between the Greek Armed Forces and a third state, the consent of the Ministry of Foreign Affairs is required for the export of the military goods. Furthermore, in accordance with Ministerial Decision Φ. 900/2553/Σ.751/ of February 17, 2012 (Government Gazette B' 746), and specifically, para. 2 of Article 5, the consent of the Ministry of Foreign Affairs is also required for temporary export and re-import for the purpose of testing and/or demonstration of military goods from operating companies based in Greece.

14. License documents and any standard conditions attached to it (copies to be provided).

See application and license forms attached.

As regards, in particular, the documents required for temporary export and re-import for the purpose of testing and/or demonstration of military goods, these are specified in Ministerial Decision Φ. 900/2553/Σ.751/of February 17, 2012 (Government Gazette B'746), and specifically, para. 1 of Article 5.

15. Different types (e.g. individual, general, restricted, full, permanent, etc.) of licenses and what they are used for.

The competent Greek authorities issue individual and global licenses for export, re-export and transfer, in the following manner:

A standard export or re-export license applies for one (1) year, with the option of an additional one (1) year extension (para. 3 or article 3a LAW 2168/1993, as revised with para 5 of article 3 of LAW 4028/2011).

General Transfer licenses (for intra-community transfers) are issued in accordance with article 9 of LAW 4028/2011, as long as the security measures are enforced as indicated in article 18 of the above-mentioned law.

Global transfer licenses (for intra-community transfers) apply for three (3) years with a possibility of a two (2) year extension, in accordance with para. 3 of article 10 of LAW 4028/2011.

Finally, an individual transfer license (for intra-community transfers) is issued in accordance with para. 3 of article 11 of LAW 4028/2011 and is applicable for one (1) year with the option of another year extension.

16. Advice given to exporters as to licensability, such as the likelihood of approval for a possible transaction.

Interested exporters refer their questions to the licensing authority. The staff of the competent Directorate is in a position to inform exporters of the current status of their destination of interest prior to the submission of an application and to the subsequent trade transaction. If, for unforeseen reasons, events of a destabilizing nature occur in the receiving country, then the competent authority has the capacity to issue a denial.

17. The average number of export licenses issued annually and the staff engaged in the export licensing procedure.

The number of export licenses issued by the competent Directorate for both military and dual use goods varies, while the number of staff involved in the licensing process of the competent Directorate has been reduced. However, Departments of the Ministries of

Foreign Affairs, Defense and Citizens' Protection are also involved, in a supportive capacity, in the process of license issuance.

18. Any other relevant information pertaining to the export of conventional arms and related technology, e.g. Additional laws, reports to Parliament, special procedures for certain goods.

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19. Are all guidelines governing conventional arms transfers nationally published?

Regulations and procedures to be followed for conventional arms transfer are provided for in the pertinent legislative acts described above and are made public through the Government Gazette.

As regards the conventional arms transfers, Greece does not publish them independently but jointly with all EU member states in an Annual Report in the C' series of the Official Journal of the European Union (CFSP/944/2008 Article 8 para. 2). Relevant information for the export of the 7+1 categories of controlled conventional weapons are also submitted to the Arms Trade Treaty Secretariat on an annual basis, while the same information is uploaded to the United Nations Registry of Arms (UNROCA) for the seven categories of conventional weapons as well as Small Arms and Light Weapons.

ANNEX

As mentioned under question 14 of the questionnaire, please find attached copies of the following forms:

- Application and License form for the export of items of the Military List, used by the Authority issuing the license
- Application and License form for the export of items of the Military List, used by the Customs Office
- Application form for the export of dual use products
- License form for the export of dual use products

ΑΔΕΙΑ	1	1. Εξαγωγέας	2. Αρ. Ταυτότητας (πρωτόκολλο)	3. Ημερ. Λήξεως	
		Αρ.: .	4. Λεπτομέρειες σημείων επαφής		
		5. Παραλήπτης	6. Εκδούσα Αρχή		
		7. Αντιπρόσωπος (αν είναι διαφορετικός από τον εξαγωγέα)	 ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ ΥΠΟΥΡΓΕΙΟ ΕΞΩΤΕΡΙΚΩΝ Γ.Γ. Δ/ΝΣΗ ΟΙΚΟΝΟΜΙΚΩΝ ΣΧΕΣΕΩΝ ΚΑΙ ΕΞΩΣΤΡΕΦΕΙΑΣ Β' Γενική Διεύθυνση Διεθνών Οικονομικών Σχέσεων Β6 Δ/νση Πολυμερών Οικονομικών Σχέσεων και Εμπορικής Πολιτικής		
			8. Χώρα αποστολής	Κωδ.	
			10. Κ-μ τρέχουσας ή μελλοντικής θέσης αγαθών	Κωδ.	
		9. Τελικός χρήστης (αν είναι διαφορετικός από τον παραλήπτη)	11. Κ-μ τελωνειακής διαδικασίας εξόδου	Κωδ.	
			12. Χώρα τελικού προορισμού	Κωδ.	
		13. Περιγραφή αγαθών	14. Χώρα προέλευσης	Κωδ.	
			15. Κωδ. Αγαθού (CAS)	16. Αρ. Καταλόγου ελέγχου	
			17. Νόμισμα και αξία	18. Ποσότητα Αγαθών	
		19. Τελική Χρήση	20. Ημερομηνία σύμβασης	21. Τελων. διαδικασία	
		22. Επιπρόσθετες πληροφορίες που απαιτούνται δυνάμει της εθνικής νομοθεσίας			
			Για συμπλήρωση από την εκδούσα αρχή: ΜΕ ΕΝΤΟΛΗ ΥΠΟΥΡΓΟΥ Υπογραφή <div style="text-align: right;">Σφραγίδα</div> Όνομα-Τίτλος Τόπος Ημερομηνία		

ΑΔΕΙΑ	1	1. Εξαγωγέας	2. Αρ. Ταυτότητας (πρωτόκολλο)	
	13. Περιγραφή αγαθών	14. Χώρα Προέλευσης	Κωδ.2	
		15. Κωδ. Βασικού προϊόντος	16. Αρ. Καταλόγου ελέγχου	
		17. Νόμισμα και αξία	18. Ποσότητα αγαθών	
	13. Περιγραφή αγαθών	14. Χώρα Προέλευσης	Κωδ.2	
		15. Κωδ. Βασικού προϊόντος	16. Αρ. Καταλόγου ελέγχου	
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		15. Κωδ. Βασικού προϊόντος	16. Αρ. Καταλόγου ελέγχου	

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		17. Νόμισμα και αξία	18. Ποσότητα αγαθών

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