

Coping with U.S. Export Controls – Experiences from German Space Company perspective

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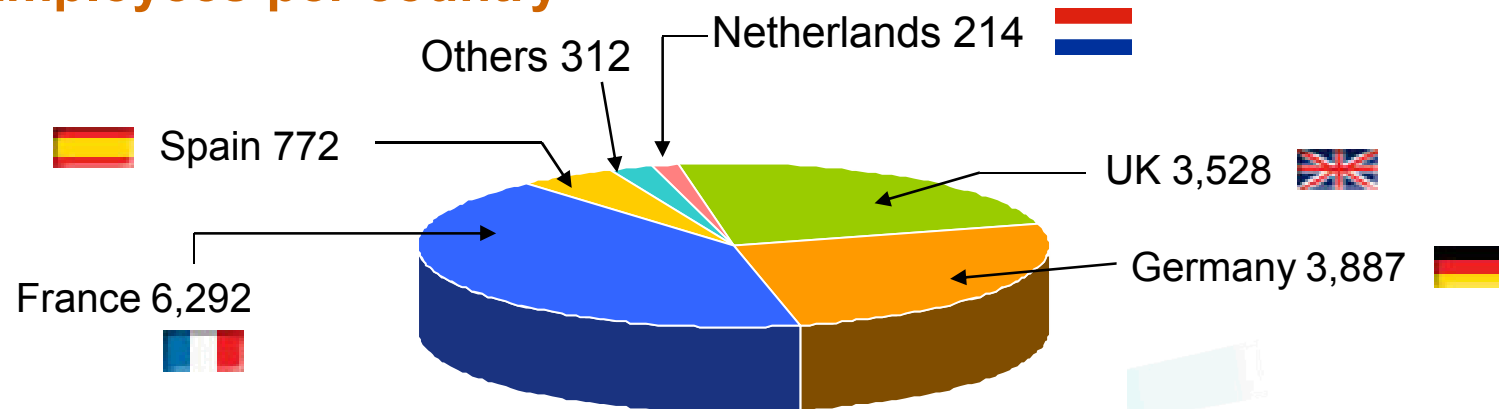


Astrium: Facts & Figures 2008

Employees: 15,005
Sites: F, G, UK, S, NL
Turnover: €4.3 billion
Order backlog: €11 billion
CEO: François Auque



Employees per country



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Astrium: the heritage and expertise of the leading European space nations



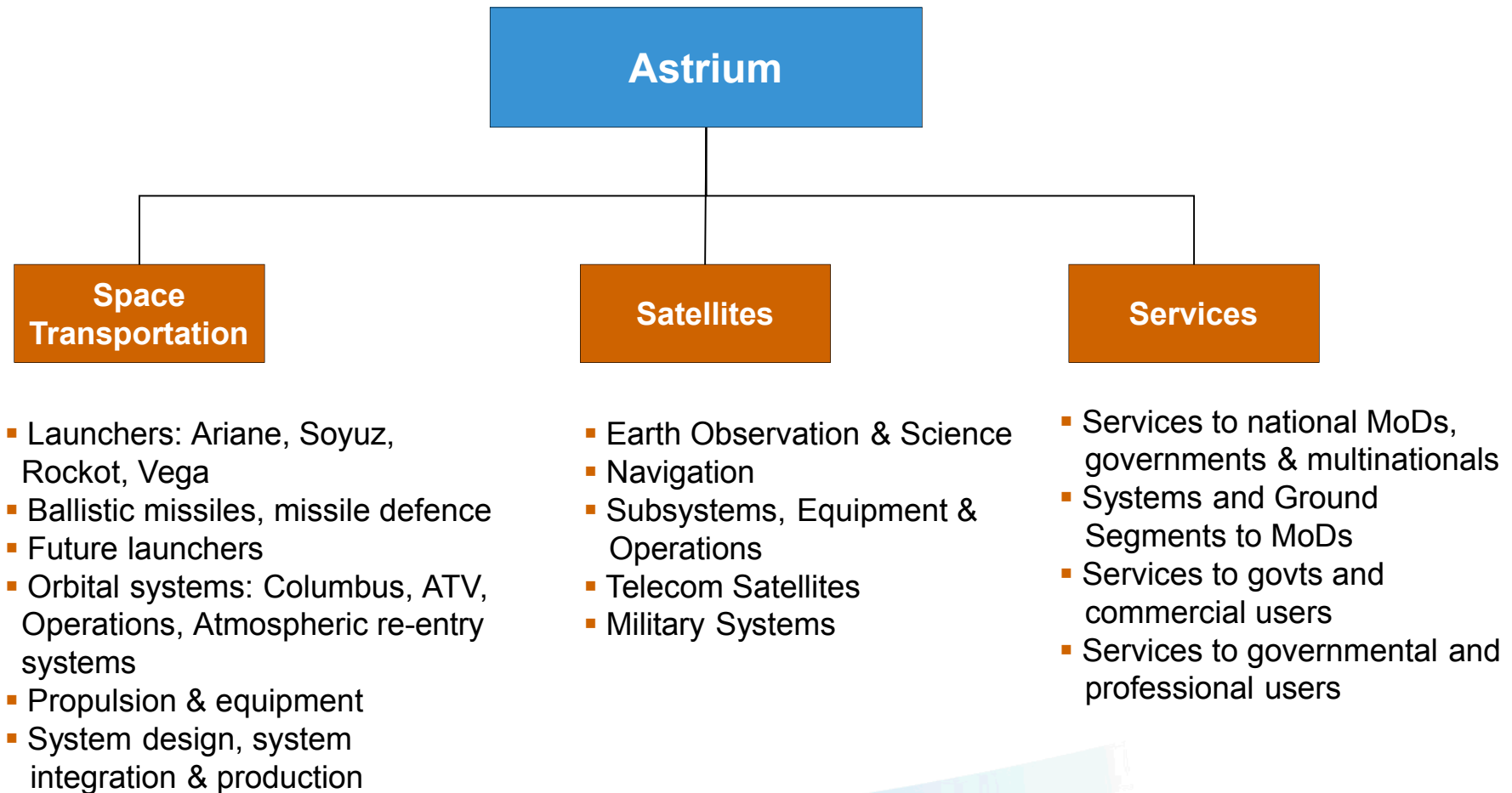
Additional locations	
France	Limeil-Brévannes (Sodern)
Germany	Backnang (Tesat) Potsdam (Infoterra)
UK	Colerne (Paradigm) Corsham (Paradigm) Hawthorn (Paradigm) Guildford (SSTL) Newcastle (Imass) Farnborough (Infoterra) Oakhanger (Paradigm)
Saudi Arabia	Riyadh (GPT)

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Export Controls

Application of export control regulations

- German dual use goods
- German military goods
- U.S. goods covered by EAR and the CCL
- U.S. goods covered by ITAR and the USML

The role of U.S. Export control regulations

- The U.S.A. is an important supply market
- A lot of goods procured from U.S. suppliers are classified under ITAR, since they are made for space application
- Due to technical complexity of space components, often a technology exchange and therefore a TAA is necessary

General Statements

- Astrium complies with all applicable export control regulations
- U.S. export control regulations and their extraterritorial application are respected
- Existence of a sufficient internal export control organisation (corresponding with EADS export control organisation)
- Existence of an Export Control Policy (corresponding with EADS Export Control Policy)

How to cope with U.S. export controls

- **Supplier management**
 - Identification of U.S. goods
 - Classification of such goods
 - Copy of licenses (in order to avoid non-compliance)
- **Separate storage of ITAR parts in stock**
 - marking of goods
 - restrictions regarding withdrawals

How to cope with U.S. export controls

- **Restricted access to U.S. technology**
access to ITAR technology only for persons covered by TAA
- **Pre-employment screening**

Challenges

- Awareness of suppliers
- Change of jurisdiction from EAR to ITAR
retroactive application of the ITAR
- EAR parts which are treated more restricted
- Allgemeines Gleichbehandlungsgesetz (AGG)

Solutions

- Software support
- Support of EADS North America (Washington)
which has close contact to U.S. authorities
- Support of suppliers
 - raise awareness
 - help them understanding the regulations
 - engage EADS North America (U.S. to U.S.)
- Permanent review of processes
- Awareness training

Summary

- Space business is greatly affected by U.S. export controls
- U.S. export controls need to be respected
- Internal export control organisation needs to reflect this and to take it into account
- Challenges can be managed
- Advantage on the market:

If a company is able to cope with U.S. export controls and has set up a sufficient and efficient organisation

Thank you

Vielen Dank

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